PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
PPG INDUSTRIES, INC.
PUBLIC HEARING AND REQUEST FOR PUBLIC COMMENT ON
DRAFT HAZARDOUS WASTE OPERATING RENEWAL PERMIT

The LDEQ, Office of Environmental Services, will conduct a public hearing to receive comments on a draft hazardous waste operating renewal permit for PPG Industries, Inc., P.O. Box 1000, Lake Charles, Louisiana, 70602 for the Westlake Facility. **The facility is located at 1300 PPG Drive, Westlake, Calcasieu Parish.**

The hearing will be held on **Thursday, September 4, 2008, beginning at 6:00 p.m., at the Westlake Council Chambers, 1001 Mulberry Street, Westlake, LA 70669.** During the hearing, all interested persons will have an opportunity to comment on the draft permit.

PPG Industries requested a hazardous waste permit renewal governing the operation of a halogen acid furnace, two incinerators, storage tanks and container storage areas at their Westlake Facility. The Westlake Facility is involved in the manufacture of chlorine, caustic and chlorinated hydrocarbons as industrial chemicals. The products produced at the Westlake Facility are used by other facilities in the manufacturing of final products. The proposed permit will be used to manage the onsite treatment and storage of waste produced by the Westlake Facility.

Three tanks are operated for the storage of chlorinated hydrocarbons; the tanks serve as feed to the combustion units. Another tank will be permitted for the storage of chlorinated wastes serving as back-up feed for the three main storage tanks. PPG also operates and maintains four container storage areas. Two container storage areas hold waste that can not be processed by permitted combustion units onsite and must be disposed of offsite at a commercial waste facility. Two other container storage areas store mercury contaminated waste from which the metal is reclaimed. The proposed permit would finalize the conditions under which PPG Industries would operate all the hazardous waste management units.

Written comments or written requests for notification of the final permit decision regarding this permit may also be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests for notification must be received by 12:30 p.m., Monday, September 8, 2008.** Written comments will be considered prior to a final permit decision.

LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The Draft Hazardous Waste Operating Renewal Permit, Fact Sheet & the associated material are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.**

Additional copies may be reviewed at the Calcasieu Parish Library-Westlake Branch, 937 Mulberry Street, Westlake, LA 70669-4601 and Calcasieu Parish Library-Sulphur Regional Branch, 1160 Cypress Street, Sulphur, LA 70663-5111.

Individuals with a disability, who need an accommodation in order to participate in the public hearing, should contact Heather Manry at the above address or by phone at (225) 219-3279.

Inquiries or requests for additional information regarding this permit action should be directed to Will F. Steele, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3134.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at deqmaillistrequest@la.gov or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the draft permit and associated information can be viewed at the LDEQ permits public notice webpage at www.deq.louisiana.gov/apps/pubNotice/default.asp and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm

All correspondence should specify AI Number 1255, Permit Number LAD008086506-OP-RN-1, and Activity Number PER19990002.

Scheduled for publication: Thursday, July 17, 2008

DRAFT
HAZARDOUS WASTE
OPERATING PERMIT

PPG INDUSTRIES, INC.
WESTLAKE FACILITY
AGENCY INTEREST 1255
PER19990002

PUBLIC RECORD COPY

FACT SHEET

FACT SHEET

FOR THE DRAFT HAZARDOUS WASTE OPERATING PERMIT RENEWAL PREPARED FOR

PPG Industries, Inc.
Westlake Facility

EPA ID# LAD 008086506
Agency Interest # 1255

1300 PPG Drive
Westlake, Louisiana
Calcasieu Parish

Permit Number LAD 008086506-OP-1-RN-1
PER19990002

I. INTRODUCTION

This fact sheet has been developed in accordance with the Louisiana Administrative Code (LAC) 33:V.703.D and briefly sets forth principal and significant facts, legal, methodological and policy requirements of the proposed draft hazardous waste permit for PPG Industries, Inc., Westlake Facility, 1300 PPG Drive, Westlake, Louisiana, Calcasieu Parish, 70669.

The Louisiana Department of Environmental Quality (LDEQ) has prepared this proposed draft hazardous waste permit which addresses the requirements of LAC Title 33, Part V, Subpart 1 and the Federal Resource Conservation and Recovery Act (RCRA) as amended by the 1984 Hazardous and Solid Waste Amendments (HSWA).

PPG Industries Inc., is seeking to renew their RCRA operating permit for two incinerators, one halogen acid furnace, four aboveground storage tanks, and four container storage areas. Provisions for site-wide corrective action will be addressed in the facility's post-closure permit application currently under review by the LDEQ.

II. THE PERMITTING PROCESS

The purpose of this fact sheet is to initiate the permitting decision process. The LDEQ, Office of Environmental Services, Waste Permits Division is required to prepare this draft hazardous waste permit. The draft hazardous waste permit sets forth all the applicable conditions, which the permittee is required to comply with during the life of the permit. PPG Industries submitted its Hazardous Waste Part B Permit Renewal Application, dated February 7, 2007, to comply with the Environmental Protection Agency (EPA) regulations requiring the ten year permit renewal for facilities that are permitted to treat, store or dispose

of hazardous waste under Subtitle C of the Resource Conservation and Recovery Act (RCRA).

The permitting process will afford the LDEQ, interested citizens, and other agencies the opportunity to evaluate the ability of the permittee to comply with the requirements of the LAC 33: V., Subpart 1, and, to the extent practicable, the Hazardous and Solid Waste Amendments (HSWA) portion. The specific remedies and conditions for corrective action will be addressed under the requirements of the Hazardous and Solid Waste Amendments.

The public is given a minimum of forty-five (45) days to review and comment on the draft permit. The administrative authority, prior to making a decision or taking any final action on the draft permit, will consider all significant comments. The decision of the administrative authority shall be to issue, deny, modify, or revoke the draft permit in accordance with LAC 33:V.705.

A. DRAFT HAZARDOUS WASTE RENEWAL PERMIT

The Waste Permits Division reviewed the permit application and other pertinent technical information, and prepared a draft permit that contains the language that pertains to the operation of the listed facilities. This draft hazardous waste permit will not contain provisions for the management of site-wide corrective action under the HSWA provisions. LDEQ will issue PPG Industries a renewal of their post-closure permit, and that permit will contain language finalizing the site-wide corrective action at the Westlake Facility.

This draft hazardous waste permit is a tentative determination and is not the final decision of the Administrative Authority.

B. PUBLIC COMMENT PERIOD

LAC 33:V.715 requires that the public be given at least forty-five (45) days to comment on a draft permit decision.

The specific dates for the opening and closing of the public comment period are contained in the public notice that was issued for this particular permitting action. Any person interested in commenting on the draft operating permit for the PPG Industries, Inc., Westlake Facility must do so within the allotted forty-five (45) day comment period.

A public hearing for the draft permit will be held on the date, and at the location and time provided in the public notice (See the attached notice in the Public Participation Section of the Draft Permit). LDEQ will hold the hearing at least thirty (30) days after the date on which the public notice is given.

Public notice of the proposed permitting action and of the hearing shall be published in specified newspapers, announced on the designated radio station, and mailed to those persons contained on the facility's mailing list.

C. LOCATIONS OF AVAILABLE INFORMATION

The administrative record, including all supporting documents, is on file at the LDEQ Public Records Center, Room 1-127, 602 North 5th Street, Baton Rouge, Louisiana. These documents may be inspected and copied (at $0.25 per copy page) at any time between the hours of 8:00 to 4:30 p.m., Monday through Friday (except holidays).

D. WRITTEN COMMENT SUBMISSION

Interested persons may submit written comments on the draft permit to the administrative authority, at the address listed below, on the closing date of the comment period. All comments should include:

1. the name and address of the commenter,
2. a concise statement of the exact basis for any comment and supporting relevant facts upon which the comment is based,
3. identification of the facility commented on (the EPA Identification Number and AI number), and
4. supporting relevant facts upon which the comments are based.

All comments, further requests for information (including copies of this decision and fact sheet) and any requests by public interest groups or individuals who would like to be included in the mailing list, should be made in writing to

Ms. Soumaya Ghosn
Louisiana Department of Environmental Quality
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313
(225) 219-3276 or fax (225) 219-3309

Any technical questions regarding this draft permit should be addressed to:

Mr. Willard F. Steele
Louisiana Department of Environmental Quality
Office of Environmental Services
Waste Permits Division
Post Office Box 4313
Baton Rouge, LA 70821-4313
(225) 219-3134 or fax (225) 219-3158

III. DESCRIPTION OF OVERALL SITE

Currently, the plant employs approximately 1425 workers and is located on approximately 1000 acres of land. The plant operates twenty-four hours a day and seven days a week. The Westlake Facility is an organic chemical, inorganic chemical and silica production plant. The Westlake Facility is divided into three major production areas or units: Chlor/Alkali, Derivatives, and Silica Products Areas. The Chlor/Alkali Facility produces chlorine, caustic, and hydrogen from the electrolysis of brine. The Derivatives Unit produces chlorinated hydrocarbons and muriatic acid. The chlorinated hydrocarbons include vinyl chloride, ethylene dichloride, trichloroethylene and other chlorinated organics. The Silica Products Unit produces sodium silicate from the heat treatment of sand with caustic.

Two major groups of waste streams will be managed under this draft permit, chlorinated wastes generated from the production of chlorinated hydrocarbons and mercury containing wastes generated from the production of chlorine and caustic. PPG Industries has demobilized the mercury cells and has implemented mercury-free membrane technology for the production of chlorine and caustic. Mercury containing waste will continue to be generated from remediation activities.

IV. HAZARDOUS WASTE FACILITIES

The Westlake Facility has two incineration units, one halogen acid furnace (HAF), four existing storage tanks, and four container storage units, which are existing units. This permit does not propose to add any new hazardous waste treatment, storage or disposal units to the Westlake Facility. Activities associated with the hazardous waste units include the thermal treatment of hazardous waste, the blending of hazardous waste and the storage of hazardous waste.

The bulk of the hazardous waste management activities at the Westlake Facility are associated with the storage and treatment of liquid organic waste and vent gases resulting from operations of the chlorinated hydrocarbon production facilities. Material created as a result of the production of chlorinated hydrocarbons is categorized into usable or unusable material. Unusable material is treated in both Incinerators No. 1 and 2 or in the No. 3 HAF. Waste Material is stored in three tanks, No.1 Waste Tank (60-1187), No. 2 Waste Tank (60-1188), and No. 3 Waste Tank (60-1867). These three tanks feed waste into the three combustion units. The fourth hazardous waste tank, No. 3 Bottoms Tank (recyclable

material storage tank) is used as a back-up feed tank for the HAF and incinerators.

The Westlake Facility would also be permitted to operate four container storage areas. Two container storage areas store mercury containing waste, the Mercury Drum Storage Area and the Mercury Recovery Unit Container Storage Area. The storage of the mercury waste is associated with waste generated by the Mercury Cell Chlor-Alkali Production Plant and the Mercury Recovery Unit, which is a RCRA exempt unit that recovers usable mercury from mercury containing waste. The Mercury Cell Chlor-Alkali Production Plant has been closed/dismantled and chlorine is now produced by a process that does not utilize mercury. These container storage areas are designed to hold only solid materials and no free liquids. The remaining two container storage areas are the Hazardous Waste Container Storage (RCRA 2) and Hazardous Waste Storage/Loading Area (RCRA 1). These two units store drum containerized waste holding liquid hazardous waste. These two units are coated with a chemically compatible liner and designed to prevent the release of spilled materials. The container storage areas will be designed and operated in accordance with the provisions of this draft permit.

V. FINANCIAL AND LIABILITY REQUIREMENTS

PPG Industries has submitted documentation to satisfy the financial assurance and liability requirements of LAC 33:V. Chapter 37.

VI. IT QUESTION SUMMARY OF ANALYSIS

In accordance with the requirements set forth by the Louisiana Supreme Court in Save Ourselves v. Louisiana Environmental Control Commission 1152 (la. 1983), the LDEQ has considered the following factors in the draft decision of this renewal permit. This is a preliminary analysis based on information currently available to the LDEQ.

A. The potential and real adverse environmental effects of the proposed project have been avoided to the maximum extent possible.

PPG Industries has submitted its Part B Permit Renewal Application for the existing Westlake Facility, which includes two incinerators, one halogen acid furnace, four storage tanks, and four container storage areas. This permit renewal does not propose the alteration of waste classifications, codes or characteristics from what is currently managed at the site.

In addition, PPG Industries has no units active in land application treatment and disposal of hazardous waste. No land application of waste is proposed under this draft permit. The design and operation of all remaining storage units, tank treatment units, and combustion units will follow the regulations to prevent the unauthorized release of any stored material into the environment.

PPG Industries has performed trial burns for all the combustion units at the Westlake Facility to demonstrate the ability to operate the units in accordance with applicable air emission standards. The applicable air emission standards will be the MACT standards for incinerators and boiler and industrial furnaces.

PPG Industries has already performed all the required MACT tests burns. This permit will not contain operating conditions for the two incinerators. The Permittee has completed the administrative process to determine the MACT operating conditions. These operating conditions for the two incinerators have been written into the Title V air permit, No. 2040-V1.

Currently, the Permittee has not completed the administrative process for determining MACT operating conditions for the No. 3 Halogen Acid Furnace. However, the Permittee has completed the testing and corresponding reporting requirements. Until the administrative process can be completed and the facility air permit be modified to include the MACT conditions, the Administrative Authority has included MACT conditions based on the MACT Test burn and associated report. These permit limits will remain in this permit until such time that the facility Title V permit can be modified to include the proper MACT BIF limits.

On-site storage at the Westlake Facility serves three purposes: storage of waste for off site disposal, storage of waste to be fed into RCRA permitted combustion units and storage of mercury contaminated waste into the RCRA exempt Mercury Recovery Unit. All tanks and container storage proposed in this draft permit are constructed and managed in accordance with the applicable regulations as reflected in this draft permit. All waste shipped off site for disposal is managed in accordance with the rules for the manifesting and transportation of hazardous waste.

Mercury containing waste was produced from the former process that produced chlorine and caustic from brine. Two of the container storage facilities at the Westlake Facility are permitted to hold mercury contaminated waste. Mercury is reclaimed from the waste using a metal recovery process. PPG Industries has closed the mercury based chlorine production process. However, mercury contaminated waste will still be generated at the Westlake Facility due to the current remediation projects. These actions minimize the potential and real adverse environmental effects of handling hazardous waste to the maximum extent possible.

B. A cost benefit analysis of the environmental impact balanced against the social and economic benefits of the project demonstrates that the social and economic benefits outweigh environmental impacts.

This is an existing facility submitting an application for permitting of its existing, hazardous waste storage and combustion units. The Westlake Facility has been in operation for several decades. PPG Industries will operate the facility's waste

management units in accordance with the appropriate regulations and the approved final permit. Any waste shipped off-site is disposed of at approved hazardous waste disposal facilities. In addition to meeting the regulatory requirements, PPG Industries has undertaken waste minimization efforts, particularly the closing of the mercury cell for chlorine production.

Over 1425 area residents are employed at the Westlake Facility. Both the state and local economies benefit from the provision of employment and tax revenue at the Westlake Facility. The proposed permit is an important factor for the continued operation of the Westlake Facility.

The proposed permit should have little or no affect on property values or public costs pertaining to the economics of the local community, since the Westlake Facility is an existing facility. Continued operation of the Westlake Facility will also include requirements for PPG Industries to continue site-wide corrective action for soil and groundwater contamination at the Westlake Facility. Contamination at the Westlake Facility has origins stretching back to 1947. The requirements for the management and completion of site-wide corrective action at the Westlake Facility will be detailed in the upcoming Post-Closure/HSWA Permit Renewal to be issued in the near future. The proposed permit renewal should not promote the need for additional fire protection, police, medical facilities, or roads.

C. **There are no alternative projects or alternative sites or mitigating measures which offer more protection to the environment than the proposed project without unduly curtailing non-environmental benefits to the extent applicable.**

1. ALTERNATIVE PROJECTS

This draft permit renewal is for hazardous waste storage and combustion units that were operating under the terms of a previously issued authority or interim status. The permitted units are important to the operation of the Westlake Facility. PPG Industries treats chlorinated waste streams by combustion rather than shipping such material offsite for combustion. PPG Industries has devoted the resources to perform the tests and maintenance required to demonstrate compliance with the appropriate MACT standards. The alternative would require the transportation of the waste streams to an offsite commercial facility for treatment or disposal by combustion. Transportation of the waste for offsite treatment/disposal would arguably create an adverse environmental impact in addition to economic cost.

The permitting of the mercury drum storage area and the mercury recover unit container storage area are required for the proper management of mercury containing waste. PPG Industries has closed the process that creates mercury contaminated waste, turning to a cleaner membrane technology. However,

remediation projects will continue at the Westlake Facility to clean-up mercury contaminated areas. The permitted storage areas will be required to perform this vital corrective action.

The Westlake Facility produces industrial chemicals that are utilized by other industries in the production of a variety of products and materials. These industrial chemicals have a variety of end uses including, chemical manufacturing, plastics production and wastewater treatment. Waste generation is associated with the production of these industrial chemicals and there are currently no practical alternative materials. The permitting of the treatment and storage units will ensure that any waste generated is handled in a manner protective of the environment. There appears to be no known alternative projects that would offer more protection to the environment than permitting the existing facilities without unduly curtailing non-environmental benefits.

2. ALTERNATIVE SITE

This draft permit renewal is for an existing facility. The hazardous waste units to be permitted will store and treat hazardous waste that is generated on-site and are necessary for the continued operation of the Westlake Facility. Relocating these units to a different or new location could result in greater environmental impact due to siting and transportation considerations. Relocating to a new site would require that the current facility be closed possibly increasing hazardous waste generation and transportation. Also, relocation could result in an adverse impact on a previously unimpacted area.

3. MITIGATING MEASURES

The Westlake Facility is an existing facility that generates hazardous waste as a by-product from the manufacture of catalyst and chemical intermediates. As a mitigating measure, PPG Industries replaced the mercury cell-based technology for the production of chlorine with a membrane cell technology. No other mitigating measures are identified that would offer more protection to the environment than permitting the existing treatment and storage units without unduly curtailing non-environmental benefits.

SIGNATURE PAGE

DRAFT PERMIT

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

HAZARDOUS WASTE RENEWAL OPERATING PERMIT

PERMITTEE: PPG INDUSTRIES, INC.

PERMIT NUMBER: LAD008086506-OP-RN-1
Agency Interest # 1255/ Activity #PER19990002

FACILITY LOCATION: 1300 PPG DRIVE
WESTLAKE, LOUISIANA, 70669

This permit is issued by the Louisiana Department of Environmental Quality (LDEQ) under the authority of the Louisiana Hazardous Waste Control Law R.S. 20:2171 et seq., and the regulations adopted thereunder and under the authority of the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) to PPG Industries, Inc., (hereafter called the Permittee), to operate a hazardous waste Treatment, Storage and Disposal (TSD) facility located at Baton Rouge, Louisiana, at latitude 30° 13' 027" and longitude 93° 16' 059."

For the purposes of this permit, the "Administrative Authority" shall be the Secretary of the Louisiana Department of Environmental Quality, or his/her designee.

The permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein and the applicable regulations as specified in the permit. Applicable regulations are those which are in effect on the effective date of issuance of this permit.

This permit is based on the assumption that the information provided to LDEQ by the Permittee is accurate. Further, this permit is based in part on the provisions of Sections 206, 212, and 224 of the HSWA of 1984, which modify Section 3004 and 3005 of RCRA. In particular, Section 206 requires corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage or disposal facility seeking a permit, regardless of the time at which waste was placed in such unit.

Section 212 provides authority to review and modify the permit at any time. Any inaccuracies found in the submitted information may be grounds for the termination, modification, revocation, and reissuance of this permit (see LAC 33:V.323) and potential enforcement action. The Permittee must inform the LDEQ of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit shall be effective as of _____, and shall remain in effect until_____, unless revoked, reissued, modified or terminated in accordance with LAC 33:V.323 and 705 of the Louisiana Hazardous Waste Regulations. The Administrative Authority may issue any permit for a duration that is less than the maximum term of ten (10) years and the term shall not be extended beyond the maximum duration by modification in accordance with LAC 33:V.315.

Provisions of this permit may be appealed in writing pursuant to LA. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. A request for hearing must be sent to the following:

Louisiana Department of Environmental Quality
Office of the Secretary
Attention: Hearings Clerk, Legal Services Division
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

Draft

Cheryl Sonnier Nolan, Assistant Secretary
Louisiana Department of Environmental Quality

_____
Date

PUBLIC PARTICIPATION

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
PPG INDUSTRIES, INC.
PUBLIC HEARING AND REQUEST FOR PUBLIC COMMENT ON DRAFT HAZARDOUS WASTE OPERATING RENEWAL PERMIT

The LDEQ, Office of Environmental Services, will conduct a public hearing to receive comments on draft hazardous waste operating renewal permit for PPG Industries, Inc., P.O. Box 1000, Lake Charles, Louisiana, 70602 for the Westlake Facility. **The facility is located 1300 PPG Drive, Westlake, Louisiana, 70669, Calcasieu Parish.**

The hearing will be held on **DAY, MONTH DATE, YEAR, beginning at 6:00 p.m., at the PHYSICAL LOCATION OF THE HEARING, CITY, LA.** During the hearing, all interested persons will have an opportunity to comment on the draft permit.

PPG Industries proposes to obtain a hazardous waste permit renewal governing the operation of a halogen acid furnace, two incinerators, storage tanks and container storage areas at their Westlake Facility. The Westlake Facility is involved in the manufacture of chlorine, caustic and chlorinated hydrocarbons as industrial chemicals. The products produced at the Westlake Facility are used by other facilities in the manufacturing of final products. The proposed permit will be used to manage the onsite treatment and storage of waste produced by the Westlake Facility.

Three tanks are operated for the storage of chlorinated hydrocarbons; the tanks serve as feed to the combustion units. Another tank will be permitted for the storage of chlorinated wastes serving as back-up feed for the three main storage tanks. PPG also operates and maintains four container storage areas. Two container storage areas hold waste that can not be processed by permitted combustion units onsite and must be disposed of offsite at a commercial waste facility. Two other container storage areas store mercury contaminated waste from which the metal is reclaimed. The proposed permit would finalize the conditions under which PPG Industries would operate all the hazardous waste management units.

Written comments or written requests for notification of the final permit decision regarding this permit may also be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests for notification must be received by 12:30 p.m., DAY, MONTH DATE, YEAR .** Written comments will be considered prior to a final permit decision.

LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The LIST DOCUMENT(S) AVAILABLE FOR REVIEW are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.**

Additional copies may be reviewed at NAME AND PHYSICAL ADDRESS OF LIBRARY OR OTHER REPOSITORY.

Previous notices have been published in the NAME OF NEWSPAPER on MONDAY, JANUARY XX, 2003.

Individuals with a disability, who need an accommodation in order to participate in the public hearing, should contact PUBLIC PARTICIPATION REPRESENTATIVE at the above address or by phone at (225) 219-0000.

Inquiries or requests for additional information regarding this permit action should be directed to Will F. Steele, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3134.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at deqmaillistrequest@la.gov or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the draft permit and associated information can be viewed at the LDEQ permits public notice webpage at www.deq.louisiana.gov/apps/pubNotice/default.asp and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm

All correspondence should specify AI Number 1255, Permit Number LAD008086506-OP-RN-1, and Activity Number PER19990002.

PART A APPLICATION

OMB#: 2050-0024 Expires 10/31/2007

MAIL THE COMPLETED FORM TO:
The Appropriate EPA Regional or State Office

United States Environmental Protection Agency

RCRA SUBTITLE C SITE IDENTIFICATION FORM

1. Reason for Submittal and Status of Information Supplied (see instructions on page 9)

MARK ALL BOX(ES) THAT APPLY

A. Reason for Submittal:

- ☐ To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities).
- ☐ To provide subsequent notification (to update site identification information).
- ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application.
- ☒ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment #_____).
- ☐ As a component of the Hazardous Waste Report.

2. Site EPA ID Number (see instructions on page 10)

EPA ID Number: LAD008086506

3. Site Name (see instructions on page 10)

Name: PPG INDUSTRIES, INC

4. Site Location Information (see instructions on page 10)

Street Address: 1300 PPG DRIVE

City, Town, or Village: WESTLAKE | State: LA

County Name: CALCASIEU | Zip Code: 70669-

5. Site Land Type (see instructions on page 10)

Site Land Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

6. North American Industry Classification System (NAICS) Code(s) for the Site (see instructions on page 10)

A. 325181 | B. 325188

C. 325199 | D.

7. Site Mailing Address (see instructions on page 11)

Street or P.O. Box: PO BOX 1000

City, Town, or Village: LAKE CHARLES | State: LA

Country: UNITED STATES | Zip Code: 70602-1000

8. Site Contact Person (see instructions on page 11)

First Name: ESTHER | MI: S | Last Name: LIGGIO

Phone Number: (337) 708-4326 Extension: | Email: LIGGIO@PPG.COM

9. Legal Owner and Operator of the Site (see instructions on pages 11 and 12)

A. Name of Site's Operator: PPG INDUSTRIES, INC. | Date Became Operator (mm/dd/yyyy): 10/07/1947

Operator Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

B. Name of Site's Legal Owner: PPG INDUSTRIES, INC. | Date Became Owner (mm/dd/yyyy): 01/01/1959

Owner Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

EPA ID No. LAD008086506 OMB#: 2050-0024 Expires 10/31/2007

9. Legal Owner (Continued) Address	Street or P.O. Box: ONE PPG PLACE
	City, Town, or Village: PITTSBURGH
	State: PA Zip Code: 15272- Country: UNITED STATES

10. Type of Regulated Waste Activity
Mark 'X' in the appropriate boxes. Mark "Yes" or "No" for each choice. (See instructions on pages 13 to 16)

A. Hazardous Waste Activities
Complete all parts for Items 1 through 6.

Y [X] N [ ] **1. Generator of Hazardous Waste**
If "Yes" choose only one of the following - a,b, or c.

- [X] a. LQG: Greater than 1,000 kg/mo (2,200 lbs.) of non-acute hazardous waste; or
- [ ] b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs.) of non-acute hazardous waste; or
- [ ] c. CESQG: Less than 100 kg/mo of non-acute hazardous waste

In addition, indicate other generator activities (check all that apply)

- Y [ ] N [X] d. United States Importer of Hazardous Waste
- Y [ ] N [X] e. Mixed Waste (hazardous and radioactive) Generator

For Items 2 through 6, check all that apply:

Y [ ] N [X] **2. Transporter of Hazardous Waste**

Y [X] N [ ] **3. Treater, Storer, or Disposer of Hazardous Waste (at your site)** Note: A hazardous waste permit is required for this activity

Y [ ] N [X] **4. Recycler of Hazardous Waste (at your site)**
Note: A hazardous waste permit may be required for this activity.

5. Exempt Boiler and/or Industrial Furnace

- Y [ ] N [X] a. Small Quantity On-site Burner Exemption
- Y [X] N [ ] b. Smelting, Melting, Refining Furnace Exemption

Y [ ] N [X] **6. Underground Injection Control**

B. Universal Waste Activities

1. Large Quantity Handler of Universal Waste (accumulate 5,000 KG or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste generated and/or accumulated at your site. (check all boxes that apply)

	Generated	Accumulated
a. Batteries	[ ]	[ ]
b. Pesticides	[ ]	[ ]
c. Thermostats	[ ]	[ ]
d. Lamps	[ ]	[ ]
e. Other ANTIFREEZE	[ ]	[ ]
f. Other MERCURY-CONTAINING EQUIP.	[ ]	[ ]
g. Other ELECTRONICS	[ ]	[ ]

Y [ ] N [X] **2. Destination Facility for Universal Waste**
Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities - Mark all boxes that apply

Y [ ] N [X] **1. Used Oil Transporter**
If "Yes", mark each that applies.
- [ ] a. Transporter
- [ ] b. Transfer Facility

Y [ ] N [X] **2. Used Oil Processor and/or Re-refiner -**
If "Yes", mark each that applies.
- [ ] a. Processor
- [ ] b. Re-refiner

Y [ ] N [X] **3. Off-Specification Used Oil Burner**

Y [ ] N [X] **4. Used Oil Fuel Marketer**
If "Yes", mark each that applies.
- [ ] a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- [ ] b. Marketer Who First Claims the Used Oil Meets the Specifications

EPA ID No. LAD008086506 OMB#: 2050-0024 Expires 10/31/2007

11. Description of Hazardous Wastes (see instructions on page 17)

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

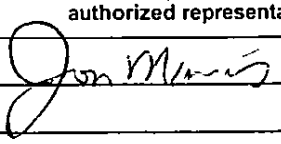
D001	D002	D003	D004	D005	D006	D007
D008	D009	D011	D018	D019	D020	D021
D022	D025	D027	D028	D029	D030	D032
D033	D034	D035	D038	D039	D040	D042
D043	F001	F002	F003	F004	F005	F024
F025	K018	K019	K020	K028	K030	K095
K096	K106	P012	P023	P075	P082	P098

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.

Comments (see instructions on page 17)

P106 U001 U002 U003 U006 U019 U037 U043 U044 U052 U055 U070 U076 U077 U078 U079 U080 U095 U108 U112 U127 U131 U133 U147 U151 U153 U154 U159 U188 U196 U210 U213 U220 U226 U227 U228 U239 U404

13. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are signifigant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. **(see instructions on page 17)**

Signature of owner, operator, or an authorized representative	Name and Official Title (type or print)	D. Date Signed (mm-dd-yyyy)
	JON MANNS WORKS MANAGER	02/21/2008

OMB# 2050-0034 Expires 10/31/2002

United States Environmental Protection Agency

HAZARDOUS WASTE PERMIT INFORMATION FORM

1. Facility Permit Contact (See instructions on page 35)	First Name: Esther	MI: S	Last Name: Liggio
	Phone Number:337-708-4326		Phone Number Extension:
2. Facility Permit Contract Mailing Address (See instructions on page 35)	Street or P.O. Box: P. O. Box 1000		
	City, Town or Village: Lake Charles		
	State: LA		
	County: Calcasieu		Zip Code: 70602-1000
3. Legal Owner Mailing Address and Telephone Number (See instructions on page 35)	Street or P.O. Box: One PPG Place		
	City, Town or Village: Pittsburgh		
	State: PA		
	County:	Zip Code:15272	Phone Number: 412-434-3131
4. Operator Mailing Address and Telephone Number (See instructions on page 35)	Street or P.O. Box: P.O. Box 1000		
	City, Town or Village: Lake Charles		
	State: LA		
	County: Calcasieu	Zip Code: 70602-1000	Phone Number: 337-708-4500
5. Facility Existence Date (See instructions on page 36)	Facility Existence Date (mm/dd/yyyy): 07/1970		

6. Other Environmental Permits (See instructions on page 36)

A. Permit Type *(Enter Code)*	B. Permit Number	C. Description
N	LA0000761	
P	LA520	
R	GD508-11	
F	Attached	
E	Attached	

7. Nature of Business (Provide a brief description; see instructions on page 37)

PPG Industries, Inc., Lake Charles, LA is a heavy industrial chemical manufacturing facility producing both inorganic and halogenated (C2) organic compounds, including the following: Chlorine, Sodium Hydroxide, Amorphous Silica Products, Perchloroethylene, Trichloroethlene, Muriatic Acid, Vinyl Chloride, Methyl Chloroform, Sodium Silicate, Ethylene Dichloride, Hydrogen, Ethyl Chloride, Trans-1,2-Dichloroethene

8. Process Codes and Design Capacities (See instructions on page 37)

A. PROCESS CODE - *Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in Item 9.*

B. PROCESS DESIGN CAPACITY- *For each code entered in column A, enter the capacity of the process.*

1. AMOUNT - *Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.*

2. UNIT OF MEASURE - *For each amount entered in column B(1), enter the code in column B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.*

C. PROCESS TOTAL NUMBER OF UNITS - *Enter the total number of units for each corresponding process code.*

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	Disposal:	
D79	Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day
D80	Landfill	Acre-feet; Hectare-meter; Acres; Cubic Meters; Hectares; Cubic Yards
D81	Land Treatment	Acres or Hectares
D82	Ocean Disposal	Gallons Per Day or Liters Per Day
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards
D99	Other Disposal	Any Unit of Measure Listed Below
	Storage:	
S01	Container	Gallons; Liters; Cubic Meters; or Cubic Yards
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards
S03	Waste Pile	Cubic Yards or Cubic Meters
S04	Surface Impoundment Storage	Gallons; Liters; Cubic Meters; or Cubic Yards
S05	Drip Pad	Gallons; Liters; Acres; Cubic Meters; Hectares; or Cubic Yards
S06	Containment Building Storage	Cubic Yards or Cubic Meters
S99	Other Storage	Any Unit of Measure Listed Below
	Treatment:	
T01	Tank Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour
T02	Surface Impoundment Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Gallons Per Day; Liters Per Hour; or Million Btu Per Hour
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; Btu Per Hour; or Million Btu Per Hour

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Short Tons Per Day; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
T82	Lime Kiln	
T83	Aggregate Kiln	
T84	Phosphate Kiln	
T85	Coke Oven	
T86	Blast Furnace	
T87	Smelting, Melting, or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Gallons Per Hour; Liters Per Hour; or Million Btu Per Hour
T88	Titanium Dioxide Chloride Oxidation Reactor	
T89	Methane Reforming Furnace	
T90	Pulping Liquor Recovery Furnace	
T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid	
	Halogen Acid Furnaces	
	Other Industrial Furnaces	
T92	Listed In 40 CFR §260.10	
T93		
T94	Containment Building - Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour
	Miscellaneous (Subpart X):	
X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day
X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G
Gallons Per Hour	E
Gallons Per Day	U
Liters	L
Liters Per Hour	H
Liters Per Day	V

UNIT OF MEASURE	UNIT OF MEASURE CODE
Short Tons Per Hour	D
Metric Tons Per Hour	W
Short Tons Per Day	N
Metric Tons Per Day	S
Pounds Per Hour	J
Kilograms Per Hour	R
Million Btu Per Hour	X

UNIT OF MEASURE	UNIT OF MEASURE CODE
Cubic Yards	Y
Cubic Meters	C
Acres	B
Acre-feet	A
Hectares	Q
Hectare-meter	F
Btu Per Hour	I

8. Process Codes and Design Capacities (Continued)

EXAMPLE FOR COMPLETING Item 8 (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY (1) Amount (Specify)	(2) Unit of Measure (Enter Code)	C. Process Total Number Of Units	For Official Use Only
X	1	S	O	2	533.788	G	001	
	1	S	O	1	110,000	G	3	
	2	T	O	3	12,000	J	2	
	3	S	O	2	115,000	G	4	
	4	T	9	2	9,000	J	1	
	5	S	0	1	100	Y	1	
	6							
	7							
	8							
	9							
1	0							
1	1							
1	2							
1	3							

NOTE: IF you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in item 9.

9. Other Processes (See instructions on page 37 and follow instructions from Item 8 for D99, S99, T04 and X99 process codes)

Line Number		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY (1) Amount (Specify)	(2) Unit of Measure (Enter Code)	C. Process Total Number Of Units	D. Description of Process
X	1	T	0	4				In-situ Vitrification
	1	D	9	9	150,000	Y	1	Corrective Action Management Unit
	2							
	3							
	4							
	5							
	6							

10. Description of Hazardous Wastes (See instructions on page 37)

A. EPA HAZARDOUS WASTE NUMBER – *Enter the four digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261, Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.*

B. ESTIMATED ANNUAL QUANTITY – *For each listed waste entered in column A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.*

C. UNIT OF MEASURE – *For each quantity entered in column B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:*

ENGLISH UNIT OF MEASRURE	CODE	METRIC UNIT OF MEASRURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate the waste will be stored, treated, and/or disposed at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. Enter the first two as described above.
2. Enter '000' in the extreme right box of Item 10.D(1)
3. Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 10.E.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in Item 10.D(2) or in Item 10.E(2)

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous waste that can be described by more than on EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on the line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING Item 10 (shown in line numbers X-1, X-2, X-3, and X-4 below) – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number		A. EPA Hazardous Waste No. (Enter Code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter code)									D. PROCESSES (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
X	1	K	0	5	4	900	P	T	0	3	D	8	0				
X	2	D	0	0	2	400	P	T	0	3	D	8	0				
X	3	D	0	0	1	100	P	T	0	3	D	8	0				
X	4	D	0	0	2												Included With Above

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10. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

Line Number	A. EPA Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter code)	D. PROCESSES (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
1	F 0 0 1	31,000	T	S 0 2 T 0 3 T 9 2	
2	F 0 0 2				INCLUDED ABOVE
3	F 0 2 4				INCLUDED ABOVE
4	F 0 2 5				INCLUDED ABOVE
5	K 0 1 8				INCLUDED ABOVE
6	K 0 1 9				INCLUDED ABOVE
7	K 0 2 0				INCLUDED ABOVE
8	K 0 2 8				INCLUDED ABOVE
9	K 0 3 0				INCLUDED ABOVE
10	K 0 9 5				INCLUDED ABOVE
11	K 0 9 6				INCLUDED ABOVE
12	U 0 0 2				INCLUDED ABOVE
13	U 0 4 3				INCLUDED ABOVE
14	U 0 7 7				INCLUDED ABOVE
15	U 0 7 8				INCLUDED ABOVE
16	U 0 7 9				INCLUDED ABOVE
17	U 2 1 0				INCLUDED ABOVE
18	U 0 8 0				INCLUDED ABOVE
19	U 2 2 6				INCLUDED ABOVE
20	U 2 2 7				INCLUDED ABOVE
21	U 2 2 8				INCLUDED ABOVE
22	U 1 5 9				INCLUDED ABOVE
23	U 0 7 6				INCLUDED ABOVE
24	D 0 0 1				INCLUDED ABOVE
25	D 0 0 2				INCLUDED ABOVE
26	D 0 0 3				INCLUDED ABOVE
27	D 0 0 6				INCLUDED ABOVE
28	D 0 0 7				INCLUDED ABOVE
29	D 0 0 8				INCLUDED ABOVE
30	D 0 0 9				INCLUDED ABOVE
31	D 0 1 1				INCLUDED ABOVE
32	D 0 1 8				INCLUDED ABOVE
33	D 0 1 9				INCLUDED ABOVE
34	D 0 2 1				INCLUDED ABOVE
35	D 0 2 2				INCLUDED ABOVE
36	D 0 2 7				INCLUDED ABOVE
37	D 0 2 8				INCLUDED ABOVE
38	D 0 2 9				INCLUDED ABOVE
39	D 0 3 0				INCLUDED ABOVE
40	D 0 3 2				INCLUDED ABOVE
41	D 0 3 3				INCLUDED ABOVE
42	D 0 3 4				INCLUDED ABOVE

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10. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

[redacted] Number		A. EPA Hazardous Waste No. (Enter Code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter code)									D. PROCESSES (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
4	3	D	0	3	5												INCLUDED ABOVE
4	4	D	0	3	9												INCLUDED ABOVE
4	5	D	0	4	0												INCLUDED ABOVE
4	6	D	0	4	2												INCLUDED ABOVE
4	7	D	0	4	3												INCLUDED ABOVE
4	8																
4	9																
5	0																
5	1																
5	2																
5	3																
5	4																
5	5																
5	6																
5	7																
5	8																
5	9																
6	0																
[redacted]	1																
[redacted]	2																
6	3																
6	4																
6	5																
6	6																
6	7																
6	8																
6	9																
7	0																
7	1																
7	2																
7	3																
7	4																
7	5																
7	6																
7	7																
7	8																
7	9																
8	0																
[redacted]	1																
[redacted]	2																
8	3																
8	4																
8	5																

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10. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

[redacted]ber		A. EPA Hazardous Waste No. (Enter Code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter code)									D. PROCESSES (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
8	6																
8	7	F	0	0	1	1,000	T	S	0	1							Included Above
8	8	F	0	0	2												Included Above
8	9	F	0	0	3												Included Above
9	0	F	0	0	4												Included Above
9	1	F	0	0	5												Included Above
9	2	F	0	2	4												Included Above
9	3	F	0	2	5												Included Above
9	4	K	0	1	8												Included Above
9	5	K	0	1	9												Included Above
9	6	K	0	2	0												Included Above
9	7	K	0	2	8												Included Above
9	8	K	0	3	0												Included Above
9	9	K	0	9	5												Included Above
1	00	K	0	9	6												Included Above
1	01	U	0	0	2												Included Above
1	02	U	0	0	6												Included Above
1	03	U	0	1	9												Included Above
[redacted]	04	U	0	3	7												Included Above
[redacted]	5	U	0	4	3												Included Above
1	06	U	0	4	4												Included Above
1	07	U	0	7	6												Included Above
1	08	U	0	7	7												Included Above
1	09	U	0	7	8												Included Above
1	10	U	0	7	9												Included Above
1	11	U	0	8	0												Included Above
1	12	U	0	9	5												Included Above
1	13	U	1	0	8												Included Above
1	14	U	1	4	7												Included Above
1	15	U	1	5	4												Included Above
1	16	U	1	5	9												Included Above
1	17	U	1	8	8												Included Above
1	18	U	1	9	6												Included Above
1	19	U	2	1	0												Included Above
1	20	U	2	1	3												Included Above
1	21	U	2	2	0												Included Above
1	22	U	2	2	6												Included Above
1	23	U	2	2	7												Included Above
[redacted]	24	U	2	2	8												Included Above
[redacted]		U	2	3	9												Included Above
1	26	D	0	0	1												Included Above
1	27	D	0	0	2												Included Above
1	28	D	0	0	3												Included Above

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10. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

[redacted] Number		A. EPA Hazardous Waste No. (Enter Code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter code)	D. PROCESSES (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
1	29	D	0	0	4				Included Above
1	30	D	0	0	5				Included Above
1	31	D	0	0	6				Included Above
1	32	D	0	0	7				Included Above
1	33	D	0	0	8				Included Above
1	34	D	0	1	1				Included Above
1	35	D	0	1	8				Included Above
1	36	D	0	1	9				Included Above
1	37	D	0	2	1				Included Above
1	38	D	0	2	2				Included Above
1	39	D	0	2	5				Included Above
1	40	D	0	2	7				Included Above
1	41	D	0	2	8				Included Above
1	42	D	0	2	9				Included Above
1	43	D	0	3	0				Included Above
1	44	D	0	3	2				Included Above
1	45	D	0	3	3				Included Above
1	46	D	0	3	4				Included Above
[redacted]	47	D	0	3	5				Included Above
[redacted]	48	D	0	3	8				Included Above
1	49	D	0	3	9				Included Above
1	50	D	0	4	0				Included Above
1	51	D	0	4	2				Included Above
1	52	D	0	4	3				Included Above
1	53								
1	54								
1	55								
1	56								
1	57								
1	58								
1	59								
1	60								
1	61								
1	62								
1	63								
1	64								
1	65								
1	66								
[redacted]	67								
[redacted]	68								
1	69								
1	70								
1	71								

OMB# 2050-0034 Expires 10/31/2002

10. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

[redacted] Number		A. EPA Hazardous Waste No. (Enter Code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter code)									D. PROCESSES (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
1	72																
1	73	D	0	0	9	10	T	S	0	1							
1	74	K	1	0	6												Included Above
1	75	U	1	5	1												Included Above
1	76																
1	77																
1	78																
1	79																
1	80																
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2	07																
2	08																
2	09																
[redacted]	10																
[redacted]																	
2	12																
2	13																
2	14																

OMB# 2050-0034 Expires 10/31/2002

10. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

[redacted] Number		A. EPA Hazardous Waste No. (Enter Code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter code)									D. PROCESSES (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
2	15	D	0	0	9	600	T	S	0	1							
2	16	K	1	0	6				[redacted]								Included Above
2	17	U	1	5	1												Included Above
2	18																
2	19																
2	20																
2	21																
2	22																
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2	51																
2	52																
[redacted]	53																
[redacted]	54																
2	55																
2	56																
2	57																

10. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

[redacted]ne [redacted]mber		A. EPA Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter code)	D. PROCESSES (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
2	58					
2	59					
2	60					
2	61					
2	62					
2	63					
2	64					
2	65					
2	66					
2	67					
2	68					
2	69					
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2	74					
2	75					
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2	92					
2	93					
2	94					
2	95					
[redacted]	96					
[redacted]	97					
2	98					
2	99					
3	00					

11. Map (See instructions on page 38)

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluid underground. Include all springs, rivers, and other surface water bodies in this map area. See instructions for precise requirements.

Please see Figure 4 for drainage and effluent discharges.

12. Facility Drawing (See instructions on page 39)

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

See Figure 1 of Part II.

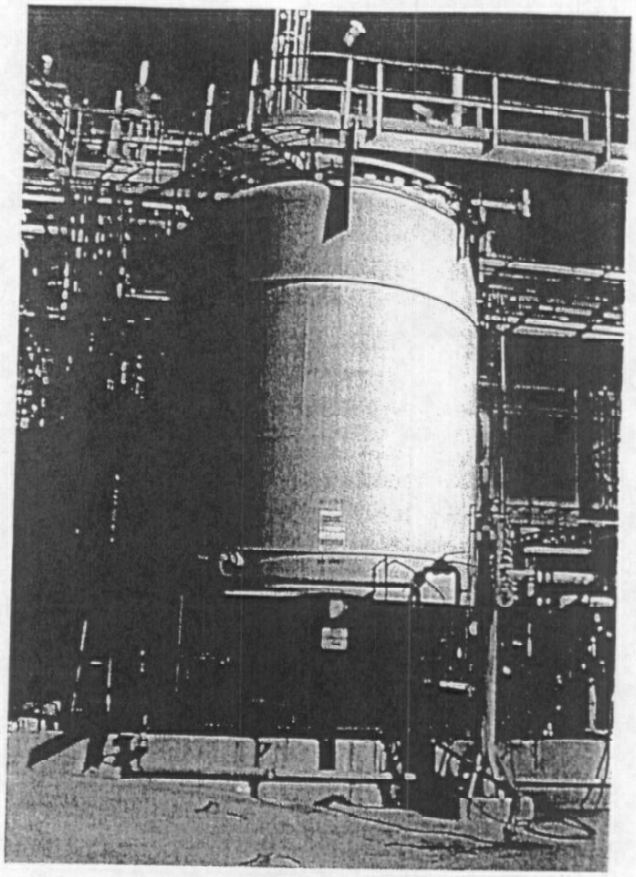
13. Photographs (See instructions on page 39)

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

Please see attached photographs. .

14. Comments (See instructions on page 39)

BEST COPY OF THE NEXT 9 PAGES



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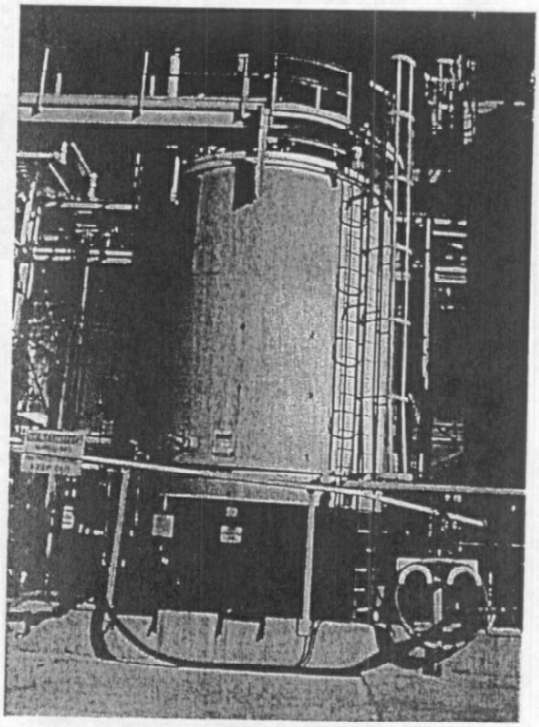

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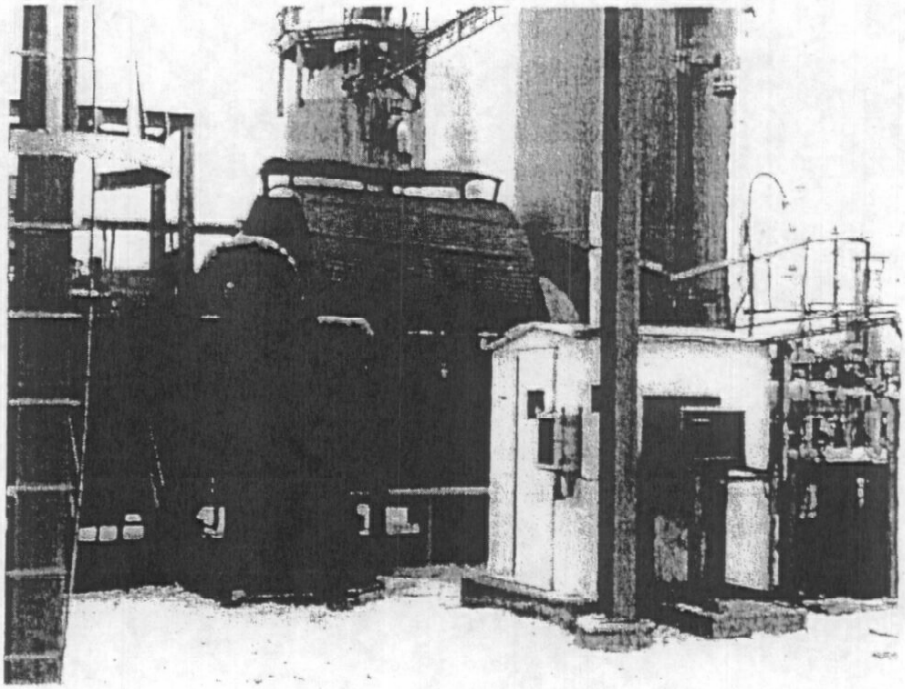

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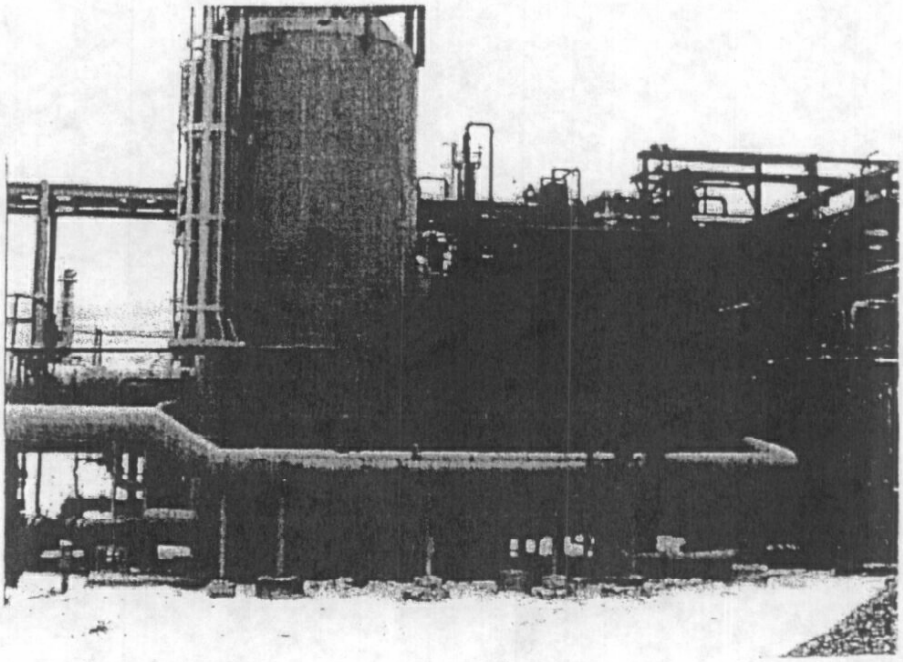

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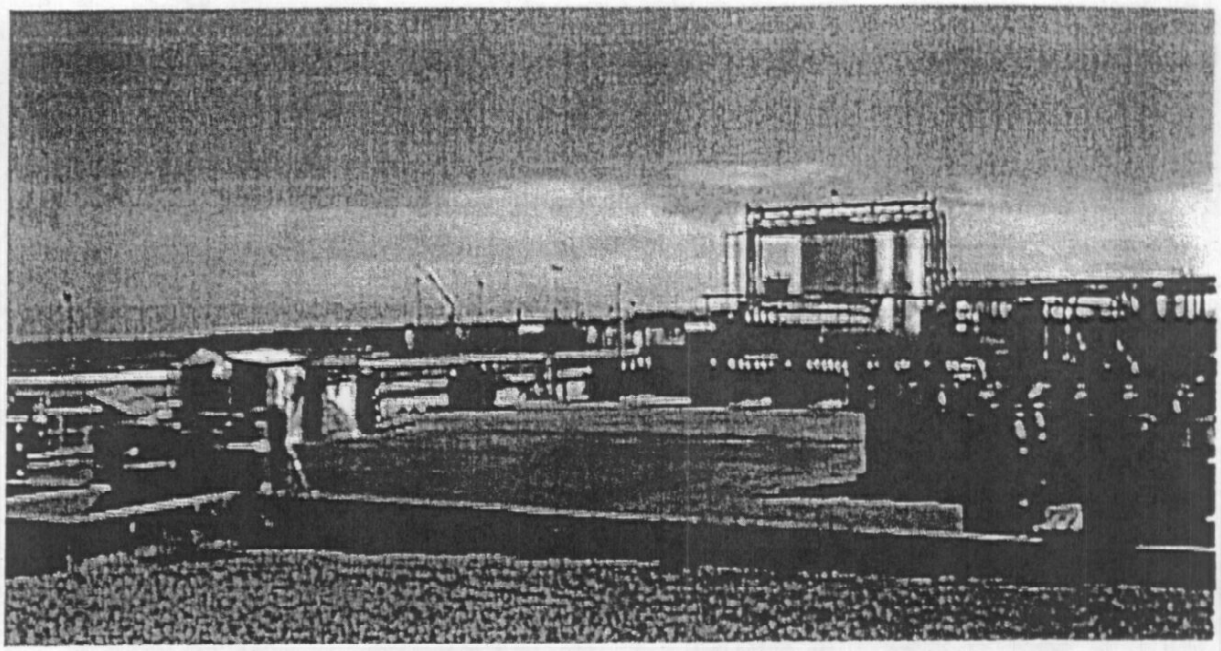

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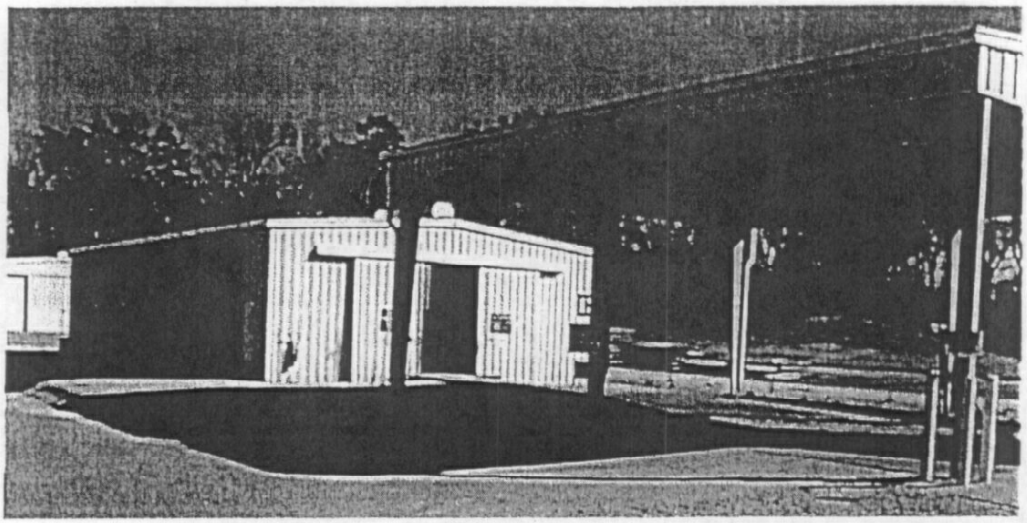
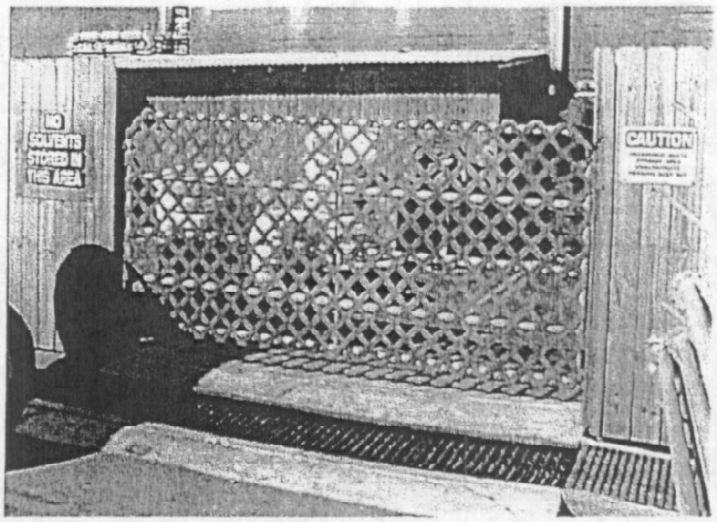
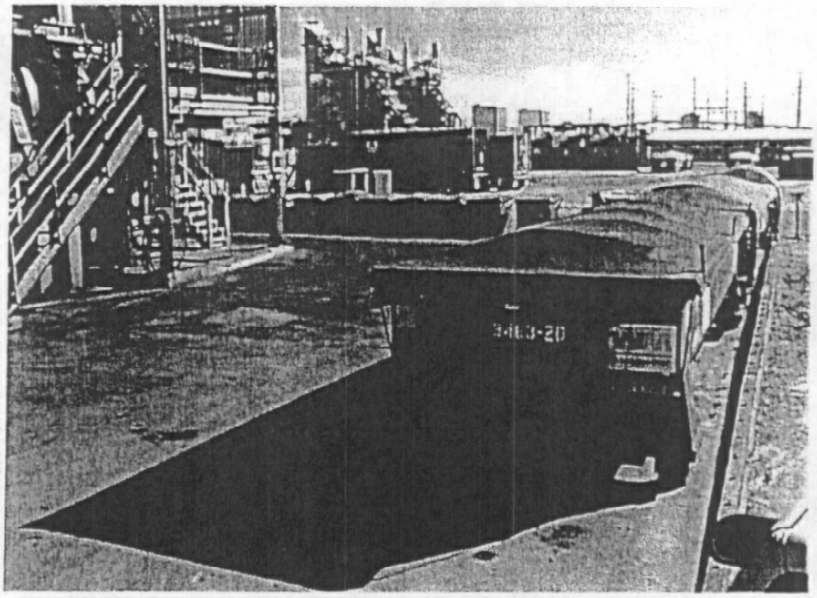


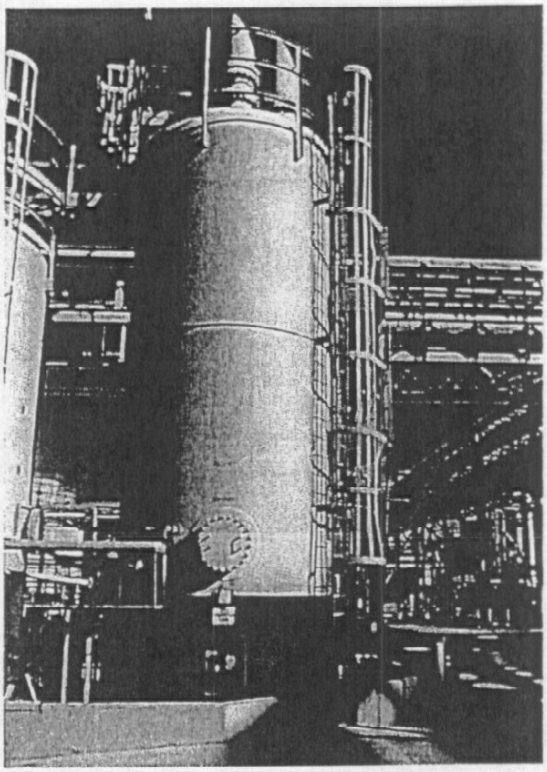
DRUM STORAGE AREA (RCRA 2)



MERCURY DRUM STORAGE AREA



MERCURY RECOVERY UNIT CONTAINER STORAGE AREA



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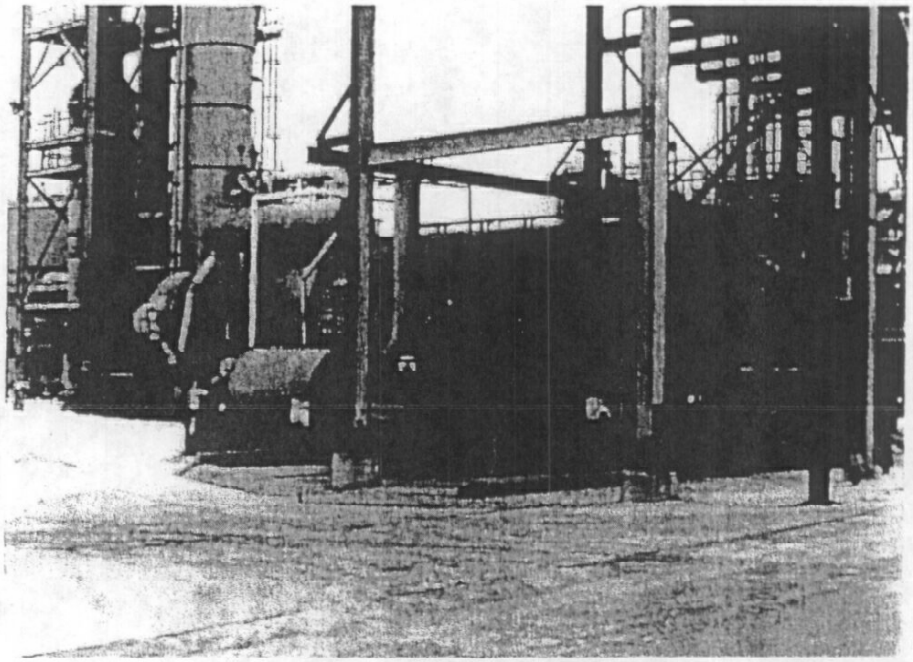

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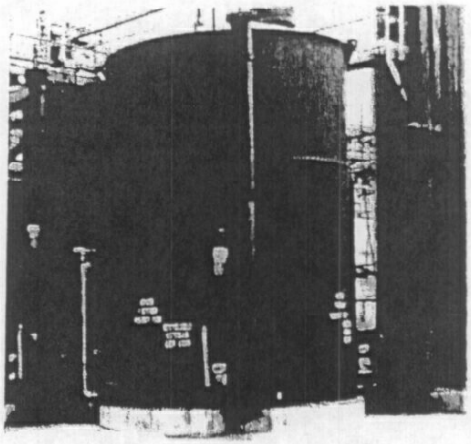

NO. 3 BOTTOMS TANK (60-2735)

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TABLE OF CONTENTS

BODY
OF PERMIT

DRAFT
HAZARDOUS WASTE OPERATING RENEWAL PERMIT

PPG Industries, Inc
EPA ID# LAD008086506
Agency Interest# 1255

Calcasieu Parish
Westlake, Louisiana
PER19990002
Permit Number LAD008086506-OP-RN-1

I. PERMIT PREAMBLE

This permit is issued to PPG Industries Inc., hereinafter referred to as the Permittee, by the Louisiana Department of Environmental Quality (LDEQ) under authority of the Louisiana Hazardous Waste Control Law, R.S. 30:2171 et seq., and the regulations adopted thereunder.

For the purposes of the permit, "Administrative Authority" shall mean the Secretary of the Department of Environmental Quality, or his/her designee.

This permit is based on information submitted in the permit application, and all subsequent amendments, and on the applicant's certification that such information is accurate and that all facilities were or will be maintained and operated as specified in the application.

This permit is conditioned upon full compliance with all applicable provisions of the Louisiana Hazardous Waste Control Law, R.S. 30:2171 et. Seq., and the regulations adopted thereunder.

GLOSSARY OF TERMS

For the purpose of this Permit, terms used herein shall have the same meaning as those in LAC 33:V.Subpart 1 unless the context of use in this Permit clearly indicates otherwise. Where terms are not otherwise defined, the meaning otherwise associated with such terms shall be as defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

"Administrative Authority" means the Secretary of the Department of Environmental Quality or his designee or the appropriate assistant secretary or his designee.

"Application" refers to the RCRA Part B Permit Application and subsequent amendments submitted by the Permittee for obtaining a Permit.

"Area of Concern" (AOC) means any discernable unit or area, which, in the opinion of the Administrative Authority, may have received solid or hazardous waste or waste containing hazardous constituents at any time. The Administrative Authority may require investigation of the unit to determine if it is a Solid Waste Management Unit (SWMU). If shown to be a SWMU by the investigation, the AOC must be reported by the Permittee as a newly identified SWMU. If the AOC is shown not to be a SWMU by the investigation, the Administrative Authority may determine that no further action is necessary and notify the Permittee in writing.

"Area of Investigation" (AOI) is a zone contiguous to and including impacted media defined vertically and horizontally by the presence of one or more constituents in concentrations exceeding the limiting SS, MO-1 RS, or MO-2 RS (depending on the option being implemented).

"Beneficial Resource" describes a natural resource that is useful to human and ecological receptors. The state may establish statutes or regulations that identify certain environmental components, such as specific ground water or surface water sources, as a "Special Beneficial Resource," or "Designated Beneficial Resource." The beneficial resource then may be entitled to greater protection from contamination.

"Constituents of Concern" (COC) means the COPCs that pose a significant risk.

"Constituents of Potential Concern" (COPC) means chemicals from hazardous waste and hazardous waste constituents that are potentially site related and have data of quality for use in the Screen or a site-specific risk assessment. The facility should compile a list of COPCs for each release site based on existing sampling data, waste analysis reports, etc.

"Conceptual Site Model" (CSM) is part of the Data Quality Objective (DQO) process that presents a three-dimensional picture of site conditions at a discrete point in time that conveys what is known about the facility, releases, release mechanisms, contaminant fate and transport,

exposure pathways, potential receptors, and risks. The information for the CSM is documented into six profiles. The CSM evolves as data gaps in the profiles become more complete, and will be refined based upon results of site characterization data. The final CSM is documented in the Risk Management Plan (RMP).

"CWA" means Clean Water Act.

"Corrective Action" is an activity conducted to protect human health and the environment.

"Department" means the Louisiana Department of Environmental Quality.

"Dense Nonaqueous Phase Liquid (DNAPL)" a dense liquid not dissolved in water, commonly referred to as "free product."

"EPA" means the United States Environmental Protection Agency.

"Facility" means, for the purpose of conducting corrective action under LAC 33:V.3322, all the contiguous property under the control of the Permittee.

"HSWA" means the 1984 Hazardous and Solid Waste Amendments to RCRA.

"Hazardous Constituent" means any constituent identified in LAC 33:V.Chapter 31, Table 1, or any constituent identified in LAC 33:V.3325, Table 4.

"LDEQ" means the Louisiana Department of Environmental Quality.

"Light Nonaqueous Phase Liquid (LNAPL)" a light liquid not dissolved in water, commonly referred to as "free product."

"Newly-discovered Release" any release(s) of hazardous waste, including hazardous constituents, in which there is a statistically significant in crease over the background data for the media of concern, during the course of groundwater monitoring, field investigation, environmental auditing, or by other means.

"Operating Record" means written or electronic records of all maintenance, monitoring, inspection, calibration, or performance testing—or other data as may be required—to demonstrate compliance with this Permit, document noncompliance with this Permit, or document actions taken to remedy noncompliance with this Permit. The minimum list of documents that must be included in the operating record is identified at LAC 33:V.1529.B.

"Permittee" means PPG Industries Inc., 1300 PPG Drive, Westlake, Louisiana 70669, Calcasieu Parish.

"RCRA Permit" means the full permit, with RCRA and HSWA portions.

"RFA" means RCRA Facility Assessment.

"RFI" means RCRA Facility Investigation.

"Release" means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping or disposing of hazardous wastes (including hazardous constituents) into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes or hazardous constituents).

"SARA" means Superfund Amendments and Reauthorization Action of 1986.

"Solid Waste Management Unit" (SWMU) means any discernable unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released.

"Stabilization" is an action taken for the purpose of controlling or abating threats to human health or the environment from releases or preventing or minimizing the further spread of contaminants while long-term remedies are pursued.

If, subsequent to the issuance of this Permit, regulations are promulgated which redefine any of the above terms, the Administrative Authority may, at its discretion, apply the new definition to this Permit.

All regulating citations are defined as being the regulations in effect on the date of issuance of this permit. New and/or amended regulations are not included as Permit requirements until permit modification procedures as specified in Condition II.C of the permit and LAC 33:V.321 are completed.

II. GENERAL PERMIT CONDITIONS

II.A. DURATION OF PERMIT

This permit is effective as of the date indicated on the accompanying signature page and shall remain in effect for a maximum period of ten (10) years from the effective date, unless suspended, modified, revoked and reissued or terminated for just cause.

II.B. EFFECT OF PERMIT

This permit authorizes the Permittee to store and treat hazardous waste in accordance with the conditions of this permit. The Permittee is prohibited from any storage, treatment or disposal of hazardous waste not authorized by statute, regulation or this permit. Compliance with this permit, LAC 33:V.Subpart 1 and HSWA, constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA and Chapter 9 of the Louisiana Environmental Quality Act (Act). However, compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Condition 3013 or Condition 7003 of RCRA, or under Condition 106 (a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) {42 U.S.C. 9606 (a)}.

In accordance with LAC 33:V.307.B and C, issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations.

II.C. PERMIT ACTIONS

Any inaccuracies found in the permit application may be cause for revocation or modification of this permit. The Permittee must inform the Administrative Authority of any deviation from, changes or inaccuracies in the information in the permit application.

The Administrative Authority may also suspend, modify, revoke and reissue, or terminate for cause when necessary to be protective of human health or the environment as specified in 40 CFR 270.41, 270.42, 270.43 or LAC 33:V.309.F, 311.A or 323. The Administrative Authority may modify the permit when the standards or regulations on which the permit was based have been changed by promulgation of amended standards or regulations or by judicial decision after the permit was issued. The filing of a request for permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of Permittee does not stay the applicability or enforceability of any permit condition.

II.D. SEVERABILITY

The conditions of this permit are severable and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

II.E. DUTIES AND REQUIREMENTS

II.E.1. Duty to Comply

The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance may be authorized by an emergency permit, as described in LAC 33:V.701. Any permit noncompliance, other than noncompliance authorized by an emergency permit, constitutes a violation of the LAC 33:V.Subpart 1 and the Environmental Quality Act and is grounds for enforcement action which may include permit termination, permit revocation and reissuance, permit modification, or denial of permit renewal application.

II.E.2. Duty to Reapply

If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee must reapply for the permit as required by the LAC 33:V.303.N and 309.B. Notification shall be at least 180 calendar days before the permit expires.

II.E.3. Permit Extension

This permit and all conditions herein will remain in effect beyond the permit's expiration date until the Administrative Authority issues a final decision on the re-application, provided the Permittee has submitted a timely, complete new permit application as provided in LAC 33:V.309.B and 315.A.

II.E.4. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

II.E.5. Duty to Mitigate

The Permittee shall immediately take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit as required by LAC 33:V.309.D.

II.E.6. Proper Operation and Maintenance

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related ancillary equipment) that are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate

quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

II.E.7. Duty to Provide Information

The Permittee shall furnish to the Administrative Authority, within a reasonable time, any information which the Administrative Authority may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Administrative Authority upon request, copies of records required by this permit and in accordance with LAC 33:V.309.H.

II.E.8. Inspection and Entry

The Permittee shall allow the Administrative Authority or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:

II.E.8.a. enter upon the Permittee's premises where a regulated activity is located or conducted, or where records must be maintained under the conditions of this permit;

II.E.8.b. have access to and copy, at reasonable times, any records that must be maintained under the conditions of this permit;

II.E.8.c. inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operation regulated or required under this permit; and

II.E.8.d. sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Administrative Authority any substances or parameters at any location.

II.E.9. Sample Monitoring and Records

II.E.9.a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, "SW-846", latest revision; Manual of Ground Water Quality Sampling Procedures, 1981, EPA-600/2-81-160, as revised; Procedures Manual for Ground Water Monitoring at Solid Waste Disposal Facilities, 1977, EPA-530/SW-611, as revised; or an equivalent method as specified in the attached Waste Analysis Plan referenced in Attachment 1.

II.E.9.b. Records of monitoring information shall include:

II.E.9.b.(1). the date, exact place, and time of sampling or measurements;

II.E.9.b.(2). the name(s) and signature(s) of the individual(s) who performed the sampling or measurements:

II.E.9.b.(3). the date(s) analyses were performed;

II.E.9.b.(4). the name(s) and signature(s) of the individual(s) who performed the analyses;

II.E.9.b.(5). the analytical techniques or methods used;

II.E.9.b.(6). the results of such analyses; and

II.E.9.b.(7). associated quality assurance performance data.

II.E.9.c. Laboratory Quality Assurance/Quality Control

In order to ensure the accuracy, precision, and reliability of data generated for use, the Permittee shall submit a statement, certified as specified in LAC 33:V.513 and included in the annual report, indicating that:

II.E.9.c.(1). any commercial laboratory providing analytical results and test data to the Department required by this permit is accredited by the Louisiana Environmental Laboratory Accreditation Program (LELAP) in accordance with LAC 33:I. Subpart 3, Chapter 45. Laboratory data generated by commercial laboratories not accredited under LELAP will not be accepted by the Department.

LAC 33:I.Subpart 3 (Chapters 45-49) provides requirements for the accreditation program. Regulations and a list of labs that have applied for accreditation are available on the LDEQ website located at: http://www.deq.louisiana.gov/portal/tabid/2412/Default.aspx.

In accordance with LAC 33:V.4501, the requirements for LELAP accreditation applies whenever data is:

- submitted on behalf of a facility;
- required as part of a permit application;
- required by order of the LDEQ;
- required to be included in a monitoring report submitted to the LDEQ;
- required to be submitted by contract; or
- otherwise required by the LDEQ regulations.

This includes, but is not limited to, data from RCRA Trial Burns, Risks Burns, Risk Assessments, MACT Comprehensive Performance Tests, and data used for continuing compliance demonstrations.

II.E.9.c.(2). If the Permittee decides to use its own in-house laboratory for test and analysis, the laboratory is not required to be accredited by LELAP. However, the laboratory must document all quality assurance/quality control procedures used to generate data for the LDEQ.

II.E.9.c.(3). For approval of equivalent testing or analytical methods, the Permittee may petition for a regulatory amendment under LAC 33:V.105.I and LAC 33:I.Chapter 9. In cases where an approved methodology for a parameter/analyte is not available or listed, a request to utilize an alternate method shall be submitted to the Administrative Authority for approval. Documentation must be submitted to the LDEQ that will verify that the results obtained from the alternate method are equal to or better than those obtained from EPA-accepted methods, as well as those deemed equivalent by the LDEQ.

II.E.10. Retention of Records

The Permittee shall maintain records through the active life of the facility (including operation, closure and post-closure periods) as required by LAC 33:V.309.J and LAC 33:V.1529.A, B, and C. All records, including plans, must be furnished upon request and made available at all reasonable times as required by LAC 33:V.1529.C. File copies shall be kept for LDEQ Inspection for a period of not less than three years as required by LAC 33:V.317.B.

The Permittee shall, for the life of the permit, maintain records of all data used to complete the application for this permit and any supplemental information submitted under the Louisiana Hazardous Waste Control Law (LA. R.S. 30:2171 et seq.).

II.E.11. Notices of Planned Physical Facility Changes

The Permittee shall give notice to the Administrative Authority, as soon as possible, of any planned physical alterations or additions to the permitted facility, in accordance with LAC 33:V.309.L.1.

II.E.12. Physical Facility after Modification

For any new or existing unit being modified, the Permittee may not manage hazardous waste in the modified portion of the unit until the unit is complete and:

II.E.12.a. the Permittee has submitted to and received approval from the Administrative Authority, by certified mail or hand delivery, a letter signed by the

Permittee and an independent registered professional engineer stating that the unit is complete and has been constructed or modified in compliance with the permit; and

II.E.12.b. the Administrative Authority has inspected the modified unit following a request to make final inspection by the Permittee and finds it is in compliance with the conditions of the permit and all applicable sections of LAC 33:V.Subpart 1, and has issued an Order to Proceed. The Permittee may then commence treatment, storage, or disposal of hazardous waste.

II.E.13. Anticipated Noncompliance

The Permittee shall give advance notice to the Administrative Authority of any planned changes in the permitted facility or activity that may result in noncompliance with permit requirements.

II.E.14. Transfer of Permits

This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to LAC 33:V.309.L.4, 321.B, 321.C.4, and 1531.D and E, as applicable.

II.E.15. Compliance Schedules

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than fourteen (14) days following each schedule date as required by LAC 33:V.309.L.6.

II.E.16. Emergency Unauthorized Discharge Notification

In accordance with LAC 33:I.3915, in the event of an unauthorized discharge that results in an emergency condition (an emergency condition is any condition which could be reasonably expected to endanger the health and safety of the public, cause significant adverse impact to the land, water, or air environment, or cause severe damage to property), the Permittee shall notify the DPS (Department of Public Safety) 24-hour Louisiana Emergency Hazardous Materials Hotline by telephone at (225) 925-6595 immediately, but in no case later than one (1) hour after learning of the discharge. The DPS 24-hour Louisiana Emergency Hazardous Materials Hotline will subsequently notify the Department regarding the details of the discharge.

II.E.17. Non-Emergency Unauthorized Discharge Notification

In accordance with LAC 33:I.3917, in the event of an unauthorized discharge that exceeds a reportable quantity specified in LAC 33:I.Chapter 39.Subchapter E and/or results in contamination of the groundwaters of the state but does not result in an

emergency condition, the Permittee shall promptly notify the Department within twenty-four (24) hours after learning of the discharge. Notification shall be made to the Office of Environmental Compliance, Emergency and Radiological Services Division, Single Point of Contact (SPOC) in accordance with the procedure and content requirements specified in LAC 33:I.3923.

II.E.18. Unauthorized Discharge to Groundwater Notification

In accordance with LAC 33:I.3919, in the event of an unauthorized discharge resulting in contamination of groundwaters of the state by moving in, into, within or on any saturated subsurface strata, the Permittee shall promptly notify the Department within twenty-four (24) hours after learning of the discharge. Notification shall be made to the Office of Environmental Compliance, Emergency and Radiological Services Division, SPOC in accordance with the procedure and content requirements specified in LAC 33:I.3923.

II.E.19. Written Notification Reports for Unauthorized Discharges

The Permittee shall submit written reports to the SPOC for any unauthorized discharges requiring notification under Condition II.E.16 through Condition II.E.18. The written report shall be submitted in accordance with the procedure and content requirements specified in LAC 33:I.3925.

II.E.20. Noncompliance Reporting

The Permittee shall report orally within twenty-four (24) hours any noncompliance with the permit not reported under Condition II.E.16 through Condition II.E.18 that may endanger the human health or the environment. This report shall include at minimum the following information:

II.E.20.a. information concerning the release of any hazardous waste that may endanger public drinking water supplies; and

II.E.20.b. information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, that could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:

II.E.20.b.(1). name, address, and telephone number of the owner or operator;

II.E.20.b.(2). name, address, and telephone number of the facility;
II.E.20.b.(3). date, time, and type of incident;

II.E.20.b.(4). name and quantity of materials involved;

II.E.20.b.(5). the extent of injuries, if any;

II.E.20.b.(6). an assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and

II.E.20.b.(7). estimated quantity and disposition of recovered material that resulted from the incident.

II.E.21. Follow-up Written Report of Noncompliance

The Permittee shall provide a written submission within five (5) days after the time the Permittee becomes aware of any noncompliance which may endanger human health or the environment and reported under Condition II.E.20. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. If the Administrative Authority waives the requirement, then the Permittee submits a written report within fifteen (15) days after the time the Permittee becomes aware of the circumstances, as required by LAC 33:V.309.L.7.

II.E.22. Other Noncompliance

The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time required monitoring reports are submitted. The reports shall contain the information listed in Condition II.E.20.

II.E.23. Other Information

Whenever the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or that it submitted incorrect information in a permit application, or in any report to the Administrative Authority, the Permittee shall promptly submit such facts or information.

II.E.24. Signatory Requirement

All applications, reports or other information submitted to the Administrative Authority shall be signed and certified according to LAC 33:V.507, 509, 511, and 513.

II.E.25. Schedule of Compliance

II.E.25.a. Forty-five (45) days after the effective date of this permit, the Permittee must submit to the Administrative Authority calculations clearly indicating how minimum tank thicknesses contained in Table 4 of this permit were derived.

II.E.25.b. Forty-five (45) days after the effective date of this permit, the Permittee must submit to the Administrative Authority a revised contingency plan complying with LAC 33:V.1513.

II.E.26. Additional Operating Standards

(RESERVED)

II.E.27. Updated Documents To Be Submitted Prior To Operation

(RESERVED)

II.E.28. Documents To Be Maintained at Facility Site

II.E.28.a. The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and any amendments, revisions, and modifications to these documents. Any revision or changes shall be submitted with the annual report unless previously submitted.

II.E.28.a.(1). Waste Analysis Plan submitted in accordance with LAC 33:V.1519 and approved by the Administrative Authority (see Attachment 1).

II.E.28.a.(2). Personnel Training Plan and the training records as required by LAC 33:V.1515 (see Attachment 1).

II.E.28.a.(3). Contingency Plan submitted in accordance with LAC 33:V.1513 and approved by the Administrative Authority (see Attachment 1).

II.E.28.a.(4). Arrangements with local authorities in accordance with LAC 33:V.1511.G (see Attachment 1).

II.E.28.a.(5). Closure Plans submitted in accordance with LAC 33:V.3511 and approved by the Administrative Authority, as well as any post-closure care requirements that may be required initially or through permit modifications in accordance with LAC 33:V.3523 (see Attachment 1).

II.E.28.a.(6). Cost estimate for facility closure care submitted in accordance with LAC 33:V.3705 and approved by the Administrative Authority, as well as any post-closure cost estimate that may be required initially or through permit modifications in accordance with LAC 33:V.3709 (see Attachment 1).

II.E.28.a.(7). Operating Records and Operations Plans referenced as required by LAC 33:V.1529, 1911.D, and 3007.K (see Attachment 1).

II.E.28.a.(8). Inspection Plan developed in accordance with LAC 33:V.517.G and 1509.B and approved by the Administrative Authority (see Attachment 1).

II.E.28.a.(9). Security Plan developed in accordance with LAC 33:V.1507 (see Attachment 1).

II.E.28.b. All proposed amendments, revisions and modifications to any plan or cost estimates required by this permit shall be submitted to the Administrative Authority for approval.

II.E.29. Annual Report

The Permittee shall submit an annual report covering all hazardous waste units and activities during the previous calendar year as required by LAC 33:V.1529.D.

II.E.30. Manifest

The Permittee shall report manifest discrepancies and un-manifested waste as required by LAC 33:V.309.L.8 and 9 and LAC 33:V.1107.

II.E.31. Emissions

Emissions from any hazardous waste facility shall not violate the Louisiana Air Quality Regulations. If air quality standards are exceeded, the site will follow air regulation protocol.

II.E.32. Water Discharges

Water discharges from any hazardous waste facility shall not violate the Louisiana Water Quality Regulations. If water standards are exceeded, the site will follow water quality regulation protocol.

II.E.33. Non-Listed Hazardous Waste Facilities

This permit is issued for those hazardous waste facilities listed in Condition IV (Permitted Facilities). If the Permittee determines that an un-permitted hazardous waste facility exists, the Permittee must immediately notify the Administrative Authority in accordance with Condition II.E.22 of the General Permit Conditions.

II.E.34. Compliance With Land Disposal Restrictions

The Permittee shall comply with those land disposal restrictions set forth in LA. R.S. 30:2193, all regulations promulgated thereunder, and the HSWA portion of this permit (Conditions VII and VIII).

II.E.35. Establishing Permit Conditions

Permits for facilities with pre-existing groundwater contamination are subject to all limits, conditions, remediation and corrective action programs designated under LAC 33:V.311.D and LAC 33:V.3303.

II.E.36. Obligation for Corrective Action

Owners or operators of hazardous waste management units must have all necessary permits during the active life of the unit and for any period necessary to comply with the corrective action requirements in Condition VIII. The Permittee is obligated to implement facility-wide corrective action regardless of the operational status of the facility. Facility-wide corrective action will be specified in the Permittee's post-closure permit renewal to be issued under Agency Interest 1255 and permit identification number PER20070003.

II.E.37. Attachments and Documents Incorporated by Reference

All attachments and documents required by this permit, including all plans and schedules, are incorporated, upon approval by the Administrative Authority, into this permit by reference and become an enforceable part of this permit. When applicable, the Permittee must modify the permit according to LAC 33:V.Chapter 3. Since required items are essential elements of this permit, failure to submit any of the required items or submission of inadequate or insufficient information may subject the Permittee to enforcement action, which may include fines, suspension, or revocation of the permit. Also, where applicable, the Permittee must meet all the permit modification requirements contained in LAC 33:V.321, 322, and 323.

Any noncompliance with approved plans and schedules shall be termed noncompliance with this permit. Written requests for extension of due dates for submittals may be granted by the Administrative Authority.

If the Administrative Authority determines that actions beyond those provided for, or changes to what is stated herein, are warranted, the Administrative Authority may modify this permit according to procedures in LAC 33:V.321.

III. GENERAL FACILITY CONDITIONS

III.A. DESIGN AND OPERATION OF ALL FACILITIES

III.A.1. The Permittee must maintain and operate all facilities to minimize the possibility of a fire, explosion, or any unauthorized sudden or non-sudden release of hazardous waste constituents to air, soil, or water that could threaten human health or the environment.

III.A.2. The Permittee shall not receive for treatment, storage, or disposal any hazardous waste generated outside the United States or its territories, in accordance with LA. R.S. 30:2189 of the Louisiana Environmental Quality Act.

III.B. REQUIRED NOTICE

(RESERVED)

III.C. GENERAL WASTE ANALYSIS

The Permittee shall follow the procedures described in the Waste Analysis Plan referenced in Attachment 1 and in accordance with LAC 33:V.1519.

III.C.1. The Permittee shall review the Waste Analysis Plan annually and report to the Administrative Authority in the annual report whether any revision is required to stay abreast of changes in EPA methods and/or State regulatory provisions.

III.C.2. Annually, the Permittee shall submit a certified statement that indicates that any laboratory (i.e., on-site laboratory or contract laboratory) that provides chemical analyses, analytical results, or other test data to the department, by contract or by agreement, is accredited in accordance with the laboratory accreditation requirements of LAC 33:I.Chapter 45. This written statement shall be certified as specified in LAC 33:V.513 and included in the annual report. This documentation shall be resubmitted when a different laboratory is contracted for services.

III.C.3. If there is reason to believe that the hazardous waste has changed or the operation generating the hazardous waste has changed, the Permittee shall review and re-characterize all potentially impacted hazardous waste streams generated by the Permittee on-site and treated, stored, and/or disposed on-site. The Permittee must re-characterize wastes in accordance with LAC 33:V.1519.A.3. This re-characterization shall include laboratory analyses which provide information needed to properly treat, store, and dispose of the hazardous waste, including physical characteristics and chemical components of the waste. The results of this re-characterization shall be summarized in the Permittee's Annual Report.

III.C.4. In accordance with LAC 33:V.1519.B, the Waste Analysis Plan must meet all sampling and QA/QC protocols contained in Condition II.E.9. All test procedures used

by the Permittee shall be maintained on file by the Permittee and made available to the LDEQ upon request.

III.D. SECURITY

The Permittee must comply with the security provisions of LAC 33:V.1507, as referenced in Attachment 1.

III.E. GENERAL INSPECTION REQUIREMENTS

The Permittee must follow the approved Inspection Plan referenced in Attachment 1. The Permittee must remedy any deterioration or malfunction discovered by an inspection as required by LAC 33:V.1509.C. Records of inspections must be kept as required by LAC 33:V.1509.D. The inspection schedule must include the regulatory requirements of LAC 33:V.517.G, 1509, 1911, 2109, 3007.J, and 3119.

III.F. PERSONNEL TRAINING

The Permittee must conduct personnel training as required by LAC 33:V.1515.A, B, and C. The Permittee shall follow the approved Personnel Training Plan referenced in Attachment 1. The Permittee shall maintain all training documents and records as required by LAC 33:V.1515.D and E.

III.G. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

The Permittee must take precautions as required by LAC 33:V.1517 to prevent accidental ignition or reaction of ignitable or reactive wastes. The Permittee shall store ignitable, reactive, or incompatible wastes only in accordance with LAC 33:V.1517, 1917, 1919, 2113, and 2115.

III.H. LOCATION STANDARDS

III.H.1. The Permittee has furnished that it is in compliance with seismic standards as required by LAC 33:V.517.T.

III.H.2. The Permittee must not manage any hazardous waste on any portion of the property that lies within the 100 year flood plain (as identified in the Flood Insurance Rating Map) unless such areas are raised above this flood level or other means (e.g., levees) are provided to protect such areas from washouts, overtopping by wave action, soil erosion or other effects of such a flood as required by LAC 33:V.1503.B.3. Such site improvements must be certified by independent licensed professional engineers and approved by the Administrative Authority prior to any hazardous waste and/or hazardous waste units being placed thereon.

III.I. PRECIPITATION RUN-ON AND RUN-OFF

The Permittee must provide for the control by diversion and/or containment of run-on and run-off resulting from a rainfall occurring during a period of twenty-four (24) hours as defined by local rainfall records and LAC 33:V.1503.B.2. The Permittee shall comply with the requirements of LAC 33:V.1907.E.1.b and LAC 33:V.2111.B.4.

III.J. HURRICANE EVENTS

The Permittee must initiate those applicable portions of the Contingency Plan during a hurricane as well as appropriate actions required by LAC 33:V.1507, 1509 and 1511.

III.K. PREPAREDNESS AND PREVENTION

III.K.1. Required Equipment

At a minimum, the Permittee must install and maintain the equipment set forth in the Contingency Plan, as required by LAC 33:V.1511.C.

III.K.2. Testing and Maintenance of Equipment

The Permittee must test and maintain the equipment specified in Condition III.K.1 to insure its proper operation in time of emergency. The testing and maintenance of the equipment must be documented in the operating record.

III.K.3. Access to Communications or Alarm Systems

The Permittee must maintain access to the communications or alarm system as required by LAC 33:V.1511.E.1 and 1511.E.2.

III.K.4. Required Aisle Space

In no case shall aisle space be less than two (2) feet. In addition, the Permittee shall maintain adequate aisle space as required by LAC 33:V.1511.F.

III.K.5. Arrangements with Local Authorities

The Permittee shall document in the annual report that the requirements of LAC 33:V.1511.G have been met. This documentation shall include those state and local agencies involved and those facilities and operations covered. Documentation of written arrangements with state and local agencies shall also be included in this report. Where state or local authorities decline to enter into such arrangements, the Permittee must document the refusal in the operating record.

III.L. CONTINGENCY PLAN

III.L.1. Implementation of Plan

The Permittee must immediately carry out the provisions of the approved Contingency Plan referenced in Attachment 1, and follow the emergency procedures described by LAC 33:V.1513.F whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that threaten or could threaten human health or the environment.

III.L.2. Copies of Plan

The Permittee must comply with the requirements of LAC 33:V.1513.C.

III.L.3. Amendments to Plan

The Permittee must review and immediately amend, if necessary, the Contingency Plan as required by LAC 33:V.1513.D.

III.L.4. Emergency Coordinator

The Permittee must comply with the requirements of LAC 33:V.1513.E concerning the emergency coordinator.

III.M. MANIFEST SYSTEM

The Permittee shall comply with the manifest requirements of LAC 33:V.Chapter 11.

III.N. RECORDKEEPING AND REPORTING

III.N.1. Operating Record

The Permittee shall maintain a written operating record at the facility in accordance with LAC 33:V.1529.A, B, and C and the approved Operations Plan referenced in Attachment 1.

III.N.2. Annual Report

The Permittee must comply with the annual report requirements of LAC 33:V.1529.D.

III.N.3. Operations Manual

The Permittee shall compile and keep current an operations manual covering all aspects of the Permittee's storage facilities.

III.O. CLOSURE/POST-CLOSURE

The Permittee shall address the following regulatory citations in the closure plan: LAC 33:V.1915, 2117, 3005.I, 3121, 3503, 3505, 3507, 3509, 3511, 3513, and 3515. The Administrative Authority may re-evaluate the adequacy of the approved closure plan and/or the confirmatory sampling procedures prior to the commencement of closure (e.g., permit renewal applications, permit modifications, notifications of intent to close).

III.O.1. Closure Performance Standard

The Permittee shall close the facility in accordance with the approved Closure Plan referenced in Attachment 1 and in accordance with the applicable sections of LAC 33:V.3507.

III.O.2. Amendment to Closure Plan

The Permittee shall amend the Closure Plan where necessary, in accordance with LAC 33:V.3511.C. Any modification shall be subject to LAC 33:V.321, 322 and 323, where applicable

III.O.3. Notification of Closure

The Permittee shall notify the Administrative Authority at least forty-five (45) days prior to the date it expects to begin closure in accordance with LAC 33:V.3511.D.

III.O.4. Time Allowed For Closure

After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste in accordance with the schedule specified in the closure plan referenced in Attachment 1 and in accordance with LAC 33:V.3513.

III.O.5. Disposal or Decontamination of Equipment

The Permittee shall decontaminate and dispose all facility equipment in accordance with the approved Closure Plan referenced in Attachment 1 and in accordance with LAC 33:V.3515.

III.O.6. Certification of Closure

The Permittee shall certify that the facility has been closed in accordance with the specifications in the approved Closure Plan as required by LAC 33:V.3517.

III.O.7. Inventory at Closure

The Permittee shall be responsible for closure cost based upon the maximum permitted facility inventories listed below in Tables 1, 2 and 3. Maximum permitted facility inventory does not apply to the combustion units listed in Table 3.

III.P. POST-CLOSURE

The Permittee must attempt to clean close all hazardous waste units. If the facility cannot be clean closed, the Permittee shall submit a post-closure plan for approval by the Administrative Authority. If some waste residues or contaminated materials are left in place at final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519-3527, including maintenance and monitoring throughout the post-closure care period.

III.Q. COST ESTIMATE FOR CLOSURE/POST-CLOSURE

III.Q.1. The Permittee must maintain cost estimates for closure of facilities in accordance with LAC 33:V.3705 and 3707.

III.Q.2. The Permittee shall maintain and adjust the closure cost estimate for inflation, as specified in LAC 33:3705.B, 3705.C, and for other circumstances that increase the cost of closure.

III.Q.3. The Permittee must adjust the closure cost estimate within thirty (30) days after approval by the Administrative Authority of any request to modify the closure plan in accordance with LAC 33:V.3705.C. The Permittee shall consider the impact of any inventory and/or process changes on the closure cost estimate.

III.Q.4. The closure cost estimate must equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure most expensive and must be based on costs to the Permittee of hiring a third party to execute all closure activities. The closure cost estimate shall be based on the maximum permitted inventory of each facility as specified in Condition III, Tables 1, 2 and 3.

III.Q.5. If the Permittee is unable to complete clean closure of all facilities referenced in Condition III, Tables 1, 2 and 3 as per LAC 33:V.Chapter 35 and as acceptable by the Administrative Authority, a Post-Closure Plan must be submitted for each facility failing to achieve clean closure within ninety (90) days from the date that the Permittee or Administrative Authority determines that the unit must be closed as a landfill. The Post-Closure Plan must meet the requirements of LAC 33:V.3523.B.

III.R. FINANCIAL ASSURANCE FOR CLOSED UNITS

The Permittee shall establish and maintain financial assurance for closure in accordance with LAC 33:V.3707 for all treatment, storage and disposal units listed in the Condition IV of this permit.

III.S. LIABILITY REQUIREMENTS

The Permittee shall have and maintain liability coverage for sudden accidental occurrences in the amounts of $1,000,000 each occurrence and $2,000,000 annual aggregate, exclusive of legal defense costs, as required by LAC 33:V.3715.A. The Permittee shall have and maintain liability coverage for non-sudden accidental occurrences in the amounts of $3,000,000 each occurrence and $6,000,000 annual aggregate, exclusive of legal defense costs, as specified in LAC 33:V.3715.B.

III.T. INCAPACITY OF THE PERMITTEE

The Permittee must comply with LAC 33:V.3717 whenever bankruptcy is initiated for the Permittee or its institutions providing financial assurance. If insurance is used for compliance with LAC 33:V.3715, the Permittee must immediately notify the Administrative Authority if the insurance company is placed in receivership. The Permittee must establish other financial assurance or liability coverage within sixty (60) days after such an event.

III.U. POST-CLOSURE NOTICES

(RESERVED)

IV. PERMITTED UNITS

IV.A. TANKS

The tanks listed in Table 1 below are permitted to store hazardous waste consistent with the conditions of this permit. Details of the existing tanks listed in Table 1, including design and operational specifications, are contained in Condition V.A.

TABLE 1
(4) Existing Hazardous Waste Tanks

TANKS	SERVICE	WASTE	MAXIMUM PERMITTED CAPACITY (GALLONS)
60-1187	Liquid Waste Storage	The waste codes accepted at these units are referenced in the Part A of this permit.	33000
60-1188	Liquid Waste Storage		33000
60-1867	Liquid Waste Storage		23000
60-2735	Liquid Waste Storage		26000

IV.B. CONTAINER STORAGE

The container storage areas listed in Table 2 below are permitted to store hazardous waste in containers and roll-off boxes that are properly labeled and sealed containers which have been specified for this purpose and are compatible with the contained waste. The drums and roll-off boxes shall be stored in accordance with LAC 33:V.2109.

TABLE 2
(4) Existing Container Storage Areas

CONTAINER STORAGE	LOCATION	WASTE	MAXIMUM PERMITTED CAPACITY
RCRA 1	South Terminal	Assorted F, K, U, D listed wastes (See Part A Form Page 7-8)	1000 Drums or 55, 000 gallons (27,500 gallons waste containing free liquids)
RCRA 2	Derivatives	Assorted F, K, U, D listed wastes (See Part A Form Page 7-8)	708 Drums or 38, 940 gallons (28,050 gallons waste containing free liquids)
Mercury Recovery Unit	Chlor-Alkali	D009, K106, U151 (Waste Solids containing no free liquids)	100 cubic yards or 20,197gallons (waste stored in various containers, roll-off boxes, covered hoppers and drums)
Mercury Drum Storage Area	Chlor-Alkali	D009, K106, U151 (Waste Solids containing no free liquids)	100 Drums or 5500 gallons

IV.C. COMBUSTION UNITS

The combustion units listed in Table 3 below are permitted to store hazardous waste consistent with the conditions of this permit. Details of the existing combustion unit listed in Table 3, including design and operational specifications, are contained in Permit Conditions V.B through V.D.

TABLE 3
(3) Existing Combustion Units

COMBUSTION UNIT	SERVICE	LOCATION	PROCESS DESIGN CAPACITY (pounds per hours)
NCIN-1	Liquid Hazardous Waste	Chlor-Alkali	12,000
NCIN-2	Liquid Hazardous Waste	Chlor-Alkali	12,000
No. 3 Halogen Acid Furnace	Liquid Hazardous Waste	Chlor-Alkali	9,000

V. PERMIT CONDITIONS APPLICABLE TO PERMITTED UNITS

V.A. TANKS

V.A.1. Description of Tank Systems

V.A.1.a. Operation

V.A.1.a.(1). All permitted tanks and associated piping, pumps, instruments, containments, and vent controls shall be operated and maintained in accordance with LAC 33:V.Chapter 19 and the specifications and design criteria provided herein.

V.A.1.a.(2). The Permittee shall operate and maintain all permitted tanks and containment systems according to the specifications, design criteria, and design limits specified in Table 4.

V.A.1.a.(3). The design temperature and pressure for each tank listed in Table 4 shall not change unless a permit modification is requested by the Permittee and subsequently approved by the Administrative Authority.

V.A.1.b. Permitted Tanks

V.A.1.b.(1). The tanks listed in Table 4 are permitted for hazardous waste storage. These tanks have been certified by an independent, professional engineer licensed in the State of Louisiana and have sufficient structural integrity for the storage of hazardous waste.

V.A.1.b.(2). The tanks listed in Table 4 must be clearly marked with the words "Hazardous Waste".

V.A.1.b.(3). The Permittee is prohibited from storing or treating hazardous waste in any tank storage system not listed in Table 4 for greater than ninety (90) days, unless an extension is granted by the Administrative Authority, or an Emergency Permit is issued.

V.A.1.b.(4). The Permittee is prohibited from receiving any hazardous waste from offsite.

V.A.1.c. Proposed Tanks

(RESERVED)

TABLE 4
DESIGN AND OPERATING PARAMETERS FOR RCRA TANK SYSTEMS

Tank No.	Year Put Into Service	Service	Materials of Construction	Dimensions and Permitted Capacity	Design Standard	Inspection Standard	Design Temp. And Pressure	Nominal Built Thickness (inches)	Minimum Thickness (inches)	Secondary Containment Type and Capacity
60-1187	1973	Liquid Waste Storage	SA-285-C	O.D.=17'3" H=17'3" 33,000 Gal	ASME Sec. VIII Div. 1	API 510	29 PSIG @ 350F	2nd ring: 7/16" 1st ring: 1/2" btm: 1/2" top: 7/16"	0.256"	External Liner 147,000 gallons
60-1188	1973	Liquid Waste Storage	SA-285-C	O.D.=17'3" H=17'3" 33,000 Gal	ASME Sec. VIII Div. 1	API 510	29 PSIG @ 350F	2nd ring: 7/16" 1st ring: 1/2" btm: 1/2" top: 7/16"	0.256"	External Liner 147,000 gallons
60-1867	1979	Liquid Waste Storage	SA-516-70	I.D.=12'0" H=24' 23,000 Gal	ASME Sec. VIII Div. 1	API 510	30 PSIG @ 300F	2nd ring:1/2" 1st ring: 3/4" btm: 5/8" top: 9/16"	0.190"	External Liner 147,000 gallons
60-2735	1993	Liquid Waste Storage	SA-516-70	I.D.=15'0" H=20'0" 26,000 Gal	API 620	API 620	12 PSIG @ 250F	2nd ring:1/2" 1st ring: 3/4" btm: 5/8" top: 9/16"	0.0792"	External Liner 147,000 gallons

V.A.2. Permitted and Prohibited Wastes

V.A.2.a. Permitted Waste

Subject to the terms of this permit, the Permittee is allowed to store in the tanks as described in Condition V.A.1.b, and the hazardous wastes identified in the most current RCRA Subtitle C Site Identification Form (Part A Permit Application).

V.A.2.b. Prohibited Waste

The Permittee is prohibited from storing hazardous waste that is not identified in the most current RCRA Subtitle C Site Identification Form (Part A Permit Application).

V.A.3. Secondary Containment

V.A.3.a. Duty to Comply with LAC 33:V.1907.B through F

The Permittee shall design, construct, operate, and maintain the secondary containment system in accordance with LAC 33:V.1907.B through F and Table 4 of this permit. Secondary containment must contain an impervious coating or material capable of preventing lateral or vertical migration of accumulated liquid and wastes.

V.A.3.b. Prevention of Migration

V.A.3.b.(1). Secondary containment systems must be maintained and operated to prevent any migration of wastes or accumulated liquid out of the system to the soil, groundwater, or surface water at any time during the use of the tank system in accordance with LAC 33:V.1907.B.1.

V.A.3.b.(2). Ancillary equipment must be provided with secondary containment, except as excluded by LAC 33:V.1907.F.

V.A.3.b.(3). Secondary containment systems must be free of cracks or gaps and other surface defects that would allow liquid to migrate out of the containment system in accordance with LAC 33:V.1907.E.

V.A.3.b.(4). Spilled or leaked waste and/or accumulated precipitation must be removed from the secondary containment system within twenty-four (24) hours in accordance with LAC 33:V.1907.C.4.

V.A.3.b.(5). If unable to remove spilled or leaked waste and/or accumulated precipitation within twenty-four (24) hours, the Permittee must demonstrate to the Administrative Authority that more time is

required and propose an alternate schedule for removal.

V.A.3.c. Requirements for Facilities Requesting a Variance

(RESERVED)

V.A.4. OPERATING REQUIREMENTS

V.A.4.a. Duty to Comply with LAC 33:V.1909.A

The Permittee shall comply with LAC 33:V.1909.A. Hazardous wastes or treatment reagents must not be placed in a tank system if they could cause the tank, its ancillary equipment, or the containment system to rupture, leak, corrode, or otherwise fail.

V.A.4.b. Duty to Comply with LAC 33:V.1909.B

The Permittee shall comply with LAC 33:V.1909.B and Table 4 of this permit. The Permittee must use appropriate controls and practices to prevent spills and overflows from tanks and containment systems.

V.A.4.c. Tank Covers

All hazardous waste storage tanks shall be covered and shall not be vented directly to the atmosphere if the tanks are used to store, or if a possibility exists that they may be used to store, volatile or malodorous waste.

V.A.4.d. Maintenance

The Permittee shall maintain the permitted tank systems according to the design code specified for each tank as listed in Table 4 and shall not exceed the listed operating conditions.

V.A.5. Ignitable, Reactive, and Incompatible Wastes

The Permittee shall store ignitable, reactive, or incompatible wastes only in accordance with LAC 33:V.1517.B, 1917 and 1919.

V.A.6. Inspections

V.A.6.a. Inspection Schedule

The Permittee shall comply with LAC 33:V.1911.A through C by following the inspection schedule submitted in the Inspection Plan (see Attachment 1).

V.A.6.b. Daily Inspection

V.A.6.b.(1). At least once per day while the tank is operating in hazardous waste service, the Permittee shall inspect the following:

V.A.6.b.(1).a. Aboveground portions of the tank system, including the tank, ancillary piping, valves, and vent controls, to detect corrosion, cracks or releases of waste.

V.A.6.b.(1).b. Data gathered from monitoring and leak detection equipment.

V.A.6.b.(1).c. The construction materials and area immediately surrounding the externally accessible portion of the tank system and ancillary equipment, e.g. secondary containment system, to detect erosion, cracks and signs of hazardous waste releases.

V.A.6.b.(2). All deficiencies noted during daily inspections must be recorded and remedied in a timely manner.

V.A.6.c. External Inspection

At a minimum, external inspection of each tank covered by this permit shall be performed as often as required by the API designated inspection standard in Table 4. The required frequency of inspection with reference to the applicable section of the standard shall be kept on site and available for review by the Administrative Authority upon request. The inspection shall be performed by a person meeting the minimum qualifications required under the inspection standard in Table 4. The inspection checklist shall be comparable to that in API Standard 510 or 653 as applicable.

If the result of such an inspection reveals that the tank is unfit for continued service, the Permittee shall immediately stop the flow of hazardous waste into the tank and comply with LAC 33:V.1913. The certification required by LAC 33:V.1913.F shall be obtained before the tank is put back into service.

V.A.6.d. Internal Inspection

Internal inspection of each tank covered by this permit shall be performed as often as required by the inspection standard in Table 4. The required frequency of inspection with reference to the applicable section of the standard shall be kept on site and available for review by the Administrative Authority upon request. The inspection shall be performed by a person meeting the minimum qualifications

required under the inspection standard in Table 4. The inspection checklist shall be comparable to that in API Standard 510 or 653 as applicable.

If the result of such an inspection reveals that the tank is unfit for continued service, the Permittee shall immediately stop the flow of hazardous waste into the tank and comply with LAC 33:V.1913. The certification required by LAC 33:V.1913.F shall be obtained before the tank is put back into service.

V.A.6.e. Thickness Testing

V.A.6.e.(1). Thickness testing of each metallic tank covered by this permit shall be performed biennially.

V.A.6.e.(2). Tank thickness measurements shall be taken on the tank top, bottom, and shell. In addition, the measurements shall be taken at least on each tank quadrant. Tank thickness readings shall be taken in the same place during each testing event in order to form a comparison of readings for corrosion rate determination.

V.A.6.e.(3). Thickness testing of the tank bottom shall be performed as often as the internal inspection, or more often if required by the inspection standard specified in Table 4. The required frequency of inspection with reference to the applicable section of the inspection standard shall be kept onsite and made available to the Administrative Authority upon request.

V.A.6.e.(4). Tank thickness readings shall also be taken at any spot where visual corrosion or compromised integrity is evident.

V.A.6.e.(5). When any tank shell thickness measurement at a single point is less than that required in Table 4, the Permittee shall immediately comply with either Condition V.A.6.e.(5).a or b below. Condition V.A.6.e.(5).b shall not be used for any tank where the shell thickness measurement is less than 0.100 inches.

V.A.6.e.(5).a. When a tank is deemed unfit for use, the Permittee shall immediately stop the flow of hazardous waste into the tank and comply with LAC 33:V.1913. The tank shall be repaired or replaced and the certification required by LAC 33:V.1913.F shall be obtained before the tank is put back into service.

V.A.6.e.(5).b. An engineering evaluation shall be performed, conforming to the appropriate standard or standards, as allowed by the design or inspection standard in Table 4. If the evaluation determines that the tank is unfit for service, the Permittee shall comply with Condition V.A.6.e.(5).a immediately. The evaluation

must be submitted to the Waste Permits Division for approval within forty-five (45) days of the initial measurement.

V.A.6.e.(6). Tank thickness measurements shall not be averaged, unless allowed under the tank inspection standard in Table 4. Averaging of tank thickness measurements shall be brought to the attention of the Administrative Authority.

V.A.6.f. Overfill Controls

Tank operators shall check and record tank gauges each operating day. Overfill controls shall be tested to ensure that they are in working order according to the schedule proposed in the Inspection Plan (see Attachment 1).

V.A.6.g. Fiberglass Tanks

(RESERVED)

V.A.7. Response to Leaks and Spills

V.A.7.a. Duty to Comply with LAC 33:V.1913.A through E

In the event of a leak or spill from a tank system, secondary containment system, or if a system becomes unfit for use, the Permittee shall comply with LAC 33:V.1913.A through E.

V.A.7.b. Leaks and Spills

V.A.7.b.(1). Upon discovering a leak or spill, the Permittee must immediately stop the flow of hazardous waste into the tank system or secondary containment system and inspect the system to determine the cause of the release.

V.A.7.b.(2). Within twenty-four (24) hours of detecting a leak from the tank system, or in as timely a manner as is practical if the Permittee demonstrates that it is not possible to remove the waste within twenty-four (24) hours, the Permittee must remove as much waste as necessary to prevent further release from the tank or secondary containment system and to allow inspection and repair of the tank system in accordance with LAC 33:V.1913.B.

V.A.7.b.(3). Any spilled material or material trapped in sumps that is a hazardous waste or that will be disposed of as a hazardous waste must be cleaned up in a timely manner, as required by LAC 33:V.1505.C.3.

V.A.7.b.(3).a. If the collected material is discharged through a point source to United States waters or to a Publicly Owned Treatment Works, it is subject to the requirements of the Clean Water Act.

V.A.7.b.(3).b. If the collected material is released to the environment, it may be subject to reporting under applicable requirements of LAC 33:V.1505, LAC 33:I.Chapter 39, and 40 CFR Part 302.

V.A.7.b.(4). When a leak or spill occurs, the Permittee shall remove and properly dispose of any visible contamination of the soil or surface water in accordance with LAC 33:V.1913.C.2.

V.A.7.b.(5). A tank system from which a leak or spill has occurred must be closed in accordance with the approved Closure Plan and LAC 33:V.1915, unless the requirements of LAC 33:V.1913.E.2-3 are satisfied.

V.A.7.b.(5).a. For a release caused by a spill that has not damaged the integrity of the system, the Permittee shall remove the released waste and make any necessary repairs to fully restore the integrity of the system before returning the tank system to service in accordance with LAC 33:V.1913.E.2.

V.A.7.b.(5).b. For a release caused by a leak from the primary tank system to the secondary containment system, the Permittee shall repair the primary system prior to returning the tank to service in accordance with LAC 33:V.1913.E.3.

V.A.7.b.(6). If the Permittee replaces a component of the tank system to eliminate a leak, that component must satisfy the requirements for new tank systems or components in LAC 33:V.1905 and 1907.

V.A.7.b.(7). All leaks and spills shall be documented in the daily inspection log.

V.A.7.c. Major Repairs

V.A.7.c.(1). The Permittee shall comply with LAC 33:V.1913.F when performing major repairs to a tank system.

V.A.7.c.(2). Major repairs shall include, but not be limited to, installation of an internal liner, repair of a ruptured tank, repair of a ruptured secondary containment area, and removal of a tank from its foundation for any reason.

V.A.7.c.(3). The Permittee shall conform to the appropriate portion of the most recent inspection code listed in Table 4 for maintenance, inspection, re-rating, repair, and alteration of all tanks.

V.A.7.c.(4). The tank shall not be returned to service unless the Permittee has obtained a certification by an independent professional engineer licensed in the State of Louisiana that the system is capable of handling hazardous waste without release for the intended life of the system. The certification of repairs shall include an inspection in accordance with the requirements of any applicable codes, such as API 510 or API 653. The certification shall be submitted to the Administrative Authority within seven (7) days of returning the tank system to use in accordance with LAC 33:V.1913.F.

V.A.8. Air Emission Control Equipment Standards

(RESERVED)

Note: In order to prevent redundant regulation, this condition and Condition VII.B (AA-BB Air Regulations) have been reserved. The Permittee will comply with the air emission control equipment standards by complying with the provisions of its Comprehensive Fugitive Emissions Monitoring Program implemented under the facility air permit(s). Failure by the Permittee to comply with those provisions that are equivalent to the provisions in LAC 33:V.Chapter 17 will also result in a failure to comply with LAC 33:V.Chapter 17.

V.A.9. Recordkeeping and Reporting

V.A.9.a. New Tanks

In the event any new tank systems are installed, the Permittee shall obtain, and keep on file at the facility, the written statements by those persons required to certify the design and installation of new tank systems, in accordance with LAC 33:V.1905.G.

V.A.9.b. Written Assessment

The Permittee shall keep on file at the facility, written assessments of the tank systems' integrity. The assessments shall be updated at the time of submittal of a Permit Renewal Application and/or at any other time deemed necessary by the Administrative Authority (i.e., permit modifications, tank replacements, tank repairs, etc.).

V.A.9.c. Inspections

V.A.9.c.(1). The Permittee shall document in the operating record for the facility inspection of those items in Condition V.A.6.a and b.

V.A.9.c.(1).a. The daily log sheets shall include all monitored parameters for the prevention of spills and overflows, including temperature, pressures, and levels.

V.A.9.c.(1).b. The Permittee shall note all deficiencies discovered during the inspection in the inspection log.

V.A.9.c.(1).c. Corrective action taken in response to deficiencies must be included as part of the operating record for the facility.

V.A.9.c.(2). The Permittee shall document in the operating record all tests and inspections of overfilling controls.

V.A.9.c.(3). The Permittee shall keep on file at the facility the results of the internal and external inspections required by Condition V.A.6.c and d. The Permittee shall note all deficiencies discovered during the inspection in the inspection log. Corrective action taken in response to deficiencies must be included as part of the operating record for the facility.

V.A.9.c.(4). The Permittee shall keep on file at the facility all information related to tank thickness testing required under Condition V.A.6.e.

V.A.9.c.(4).a. This information shall include at a minimum the date(s) of assessment, the location where measurement readings are taken, the raw measurement data, comparison of actual reading to minimum thickness requirements, the corrosion rate, and calculation of remaining tank life.

V.A.9.c.(4).b. If an engineering evaluation is performed in accordance with Condition V.A.6.e.(5).b, the results of such an evaluation shall be kept in the operating record. The engineering evaluation must include, at minimum, details on how the evaluation was performed, references to applicable tank codes, raw data, calculations performed, and an explanation of why the tank is or is not fit for continued service.

V.A.9.c.(4).c. Any tank thickness measurements that are averaged under Condition V.A.6.e.(6) must be supported by documentation with references to the applicable tank codes. The documentation shall include all raw measurement data, calculations, and results of

averaging. This information shall be kept as a part of the operating record for the facility.

V.A.9.c.(5). The Permittee shall keep on file at the facility the records of repairs required under Condition V.A.7.c.

V.A.9.d. Releases

V.A.9.d.(1). The Permittee shall keep on file at the facility notification reports submitted under LAC 33:V.1913.D.

V.A.9.d.(2). Within twenty-four (24) hours of detecting a reportable leak or spill from a tank system or secondary containment system to the environment, the Permittee shall report the leak in accordance with either Condition II.E.16 (Emergency Unauthorized Discharge) or Condition II.E.17 (Non-Emergency Unauthorized Discharge).

V.A.9.d.(3). As required by LAC 33:V.1913.D.3, within thirty (30) days of detecting a reportable release to the environment from a tank system or secondary containment system, the Permittee shall report the following information to the Administrative Authority's Single Point of Contact (SPOC):

V.A.9.d.(3).a. Likely route of migration of the release,

V.A.9.d.(3).b. Characteristics of the surrounding soil, including soil composition, geology, hydrogeology, and climate,

V.A.9.d.(3).c. Results of any monitoring or sampling conducted in connection with the release (if available). If the Permittee finds it will be impossible to meet this time schedule, the Permittee must provide the Administrative Authority with a schedule of when the results will be available. This schedule must be provided before the required thirty (30) day submittal period expires,

V.A.9.d.(3).d. Proximity of downgradient drinking water, surface water, and populated areas, and

V.A.9.d.(3).e. A description of response actions taken or planned.

V.A.9.e. Repairs

The Permittee shall keep on file at the facility all certifications required by Condition V.A.7.c.

V.A.10. Closure and Post-Closure Care

V.A.10.a. Duty to Comply with LAC 33:V.1915.A

The Permittee shall comply with LAC 33:V.1915.A by following the procedures specified in the approved Closure Plan, see Attachment 1.

V.A.10.b. Duty to Comply with LAC 33:V.1915.B

If the Permittee demonstrates that not all contaminated soils can be practicably removed or decontaminated in accordance with Condition V.A.10.a, the Permittee shall comply with LAC 33:V.1915.B.

V.A.10.c. Post-Closure

The Permittee shall attempt to clean close all tank systems. If the surface and subsurface soils below and adjacent to the tank system cannot be clean closed and the Permittee has not demonstrated through a risk assessment approved by the Administrative Authority that closure with the remaining contaminant levels is protective of human health and the environment, the Permittee shall present a post-closure plan to the Administrative Authority for approval. If any waste residue or contaminated media are left in place at final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519 through 3527, including maintenance and monitoring throughout the post-closure care period.

V.B. CONTAINER STORAGE

The permit conditions as set forth under this Condition shall apply where applicable, to the permitted container storage areas as designated in Condition IV.B, Table 2.

V.B.1. The Permittee shall be in compliance with all appropriate conditions set forth in LAC 33:V.2101.

V.B.2. The Permittee must transfer hazardous waste from a container that is not in good condition (e.g., severe rusting, apparent structural defects) or is beginning to leak to a container that is in good condition in accordance with LAC 33:V.2103. Alternatively, the Permittee may manage the hazardous waste in a manner that complies with LAC 33:V.Chapter 21.

V.B.3. In accordance with LAC 33:V.2107.A, containers holding hazardous waste always must be closed during storage, except when it is necessary to add or remove waste.

V.B.4. In accordance with LAC 33:V.2107.B, the Permittee must not open, handle or

store containers holding hazardous waste in a manner which may rupture the container or cause it to leak.

V.B.5. The Permittee must inspect the containers and storage areas in accordance with LAC 33:V.2109 and LAC 33:V.1509. Results of such inspections must be placed in the operating record in accordance with LAC 33:V.1529.B.8.

V.B.6. Within twenty-four (24) hours of detecting a reportable leak or reportable spill from any container(s), the Permittee shall report the leak or spill in accordance with either Condition II.E.16 (Emergency Unauthorized Discharge) or Condition II.E.17 (Non- Emergency Unauthorized Discharge) of this permit.

V.B.7. The Permittee shall store all wastes in containers that are compatible with the hazardous wastes as required by LAC 33:V.2105. Hazardous wastes being transported offsite must be packaged and labeled in accordance with DOT standards listed in 49 CFR 173 and 178 as required by LAC 33:V.1109 and LAC 33:V.1759.F.

V.B.8. The Permittee must have and operate a containment system for a container storage area containing free liquids in accordance with LAC 33:V.2111.A, B.1, 2, and 4, in a manner such that:

> **V.B.8.a.** the base underlying the containers must be free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed;
>
> **V.B.8.b.** the base underlying the containers must be sloped or the containment system must be otherwise designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation, unless the containers are elevated or are otherwise protected from contact with accumulated liquid;
>
> **V.B.8.c.** run-on into the containment system must be prevented unless the collection system has sufficient excess capacity in addition to that required by LAC 33:V.2111.B.3 to contain any run-on which might enter the system.

V.B.9. The Permittee must manage any collected material as required by LAC 33:V.2111.B.6. Storm water shall be contained until an analysis establishes it meets permit limitation criteria for discharge through the NPDES treatment system, or other authorized disposal method. The Permittee must manage any collected storm water as required by LAC 33:V.2111.B.6 and any other applicable regulations.

V.B.10. The Permittee must place and store incompatible, ignitable, and reactive wastes only in accordance with LAC 33:V.1517, 2113, and 2115.

V.B.11. The Permittee shall store hazardous waste (where applicable) on pallets no more than two (2) tiers of pallets high and no more than four (4) large containers per pallet.

All containers must be stacked in such a fashion that each container identification label can be read from the access aisle in accordance with LAC 33:V.2109.B. The pallets and roll-off boxes shall be placed in rows with a minimum of two (2) feet of aisle space between rows. For containers with less than forty (40) gallons capacity, two (2) levels of containers may be stored per pallet, provided the containers are consistent in size and are not miss-shaped, bent or broken. Roll-off boxes must remain covered when not in use and must be clearly labeled in order to easily identify hazardous waste.

V.B.12. The Permittee must insure that all hazardous waste personnel receive initial and continued training to insure compliance with LAC 33:V.1515, and maintain an emergency response program in compliance with LAC 33:V.1525.

V.B.13. The Permittee must control and report all point source discharges according to LAC 33:V.1505.

V.B.14. Spilled or leaked waste shall be removed from the sump or other collection area in a timely manner as necessary to prevent overflow of the collection system as required by LAC 33:V.2111.B.5.

V.B.15. Waste analysis and other documentation regarding compatibility testing must be placed in the operating record in accordance with LAC 33:V.2115.D.

V.B.16. The Permittee shall not exceed the maximum capacity listed under Condition IV.B, of this permit for each container storage area listed.

V.B.17. At closure, the Permittee shall adhere to the procedures detailed in the approved closure plan referenced in Attachment 1 of this permit and as required by LAC 33:V.2117 and Chapter 35, Closure Requirements.

A Post-Closure Plan must be submitted for each container storage area failing to achieve clean closure (or an alternate closure standard approved under LAC 33:V.3501.D.2 or LAC 33:V.3507.B.) within 90 days from the date that the Permittee or Administrative Authority determines that the unit must be closed as a landfill. The Post-Closure Plan must meet the requirements of LAC 33:V.3523.B.

V.B.18. The Permittee shall always maintain enough secondary containment capacity to contain at least ten percent (10%) of the total volume of containers or the volume of the largest container, whichever is greater in accordance with LAC 33:V.2111.B.3. Containers that do not contain free liquids (per the Paint Filter Liquids Test) do not need to be considered in this determination.

V.B.19. Air Emission Control Equipment Standards

All containers are Level 1 containers and are managed according to the standards stated in LAC 33:V.1759 and Condition VII.B.2.

V.C. INCINERATORS

NCIN-1 (Incinerator 1) and NCIN-2 (Incinerator 2) are subject to the following provisions and to 40 CFR 63.Subpart EEE. The Permittee completed a Comprehensive Performance Test (CPT) for Incinerators 1 and 2 on September 25, 2004, followed by a supplementary test on March 13, 2007, to demonstrate compliance with 40 CFR 63 Subpart EEE. LDEQ issued a Finding of Compliance (FOC) on September 24, 2007, and transferred the operating limits to PPG's Title V air permit (No. 2040-V1).

V.C.1. Regulation of Residue

The Permittee shall regulate all hazardous waste combustion residues in accordance with LAC 33:V.3121.

V.C.2. Closure

The Permittee will close this facility in accordance with LAC 33:V.3121, LAC 33:V.Chapter 35 and the closure plan referenced in Attachment 1.

V.C.3. Permitted and Prohibited Waste

V.C.3.a. The Permittee may only burn hazardous waste with EPA waste codes listed in the current Part A except as prohibited in Condition V.C.3.b.

V.C.3.b. Burning the following wastes in Incinerators 1 or 2 is prohibited:

V.C.3.b.1. Dioxin-containing wastes identified by EPA as F020, F021, F022, F023, F026, F027, and F028 wastes in LAC 33:V.4901.

V.C.3.b.2. Source material, special nuclear material, mixed waste, or naturally occurring radioactive materials (NORM) that is not exempt pursuant to LAC 33:XV.

V.C.3.b.3. Explosive material, as defined by the Department of Transportation under 49 CFR Part 173.

V.C.3.b.4. Municipal Waste.

V.C.3.b.5. Containerized Gases.

V.C.3.b.6. Medical/Infectious wastes as defined in 40 CFR 60.51c.

V.C.3.b.7. Metal bearing wastes listed in LAC 33:V.Chapter 22.Table 12, except as described in LAC 33:V.2207.C.

V.C.3.b.8. Wastes displaying the characteristic of reactivity as defined in LAC 33:V.4903.D.

V.C.3.c. Before burning any wastes not authorized under this Permit, the Permittee shall obtain approval for a permit modification, as required under LAC 33:V.321.

V.D. HALOGEN ACID FURNACE

Permit Conditions For The No. 3 Halogen Acid Furnace

V.D.1. Regulation of Residue

The Permittee shall regulate all hazardous waste combustion residues in accordance with LAC 33:V.3025.

V.D.2. Closure

The Permittee will close this facility in accordance with LAC 33:V.3005.I, LAC 33:V.Chapter 35 and the closure plan referenced in Attachment 1. Closure costs must include allowances for decontaminating the buildings and associated equipment and adjacent contaminated soils.

V.D.3. Direct Transfer of Hazardous Waste

Direct transfer of hazardous waste shall be done only in accordance with LAC 33:V.3023.

V.D.4. Permitted and Prohibited Wastes

V.D.4.a. The Permittee may only burn hazardous wastes with EPA waste codes listed in the current Part I (EPA Part A) Permit Application.

V.D.4.b. Burning the following wastes in the No. 3 Halogen Acid Furnace is prohibited:

V.D.4.b.1. Dioxin-containing wastes identified by EPA as F020, F021, F022, F023, F026, F027, and F028 wastes in LAC 33:V.4901.

V.D.4.b.2. Source material, special nuclear material, mixed waste, or naturally occurring radioactive materials (NORM) that is not exempt pursuant to LAC 33:XV.

V.D.4.b.3. Explosive material, as defined by the Department of Transportation under 49 CFR Part 173.

V.D.4.b.4. Municipal Waste.

V.D.4.b.5. Containerized Gases.

V.D.4.b.6. Medical/Infectious wastes as defined in 40 CFR 60.51c.

V.D.4.b.7. Metal bearing wastes listed in LAC 33:V.Chapter 22.Table 12, except as described in LAC 33:V.2207.C.

V.D.4.b.8. Wastes displaying the characteristic of reactivity as defined in LAC 33:V.4903.D.

V.D.4.c. Before burning any wastes not authorized under this Permit, the Permittee shall obtain approval for a permit modification, as required under LAC 33:V.321.

V.D.5. Operating Conditions

The following operating conditions were established in the Comprehensive Performance Test under 40 CFR 63.Subpart EEE, which was completed on April 28, 2007. Upon issuance of a Finding of Compliance and a Title V permit containing the applicable conditions, the conditions below shall be removed upon approval of a Class 1[1] permit modification by the Administrative Authority.

V.D.5.a. Group A Parameter Limits

The Permittee shall operate the No. 3 Halogen Acid Furnace with a functioning system to automatically cut off waste feed to the combustion unit when operating conditions deviate from those established below. All values are hourly rolling averages or 12 hour rolling averages as specified in Table 5.

V.D.5.a.1. Whenever hazardous waste is in the unit, the hourly rolling average combustion chamber temperature shall be maintained above the minimum value of 2159 °F.

V.D.5.a.2. Whenever hazardous waste is in the unit, the hourly rolling average inlet air flow rate shall be maintained below a maximum of 910,200 standard cubic feet per hour.

V.D.5.a.3. Whenever hazardous waste is in the unit, the hourly rolling average waste feed rate shall be maintained below the maximum value of 8,972 pounds per hour.

V.D.5.a.4. Whenever hazardous waste is in the unit, the hourly rolling average carbon monoxide (CO) level shall be maintained below the

maximum value of 100 parts per million by volume, continuously corrected to seven percent oxygen, dry gas basis.

V.D.5.a.5. Whenever hazardous waste is in the unit, the hourly rolling average secondary scrubber liquid to gas ratio shall be maintained above the minimum value of 16 gallons per thousand standard cubic feet.

V.D.5.a.6. Whenever hazardous waste is in the unit, the hourly rolling average secondary scrubber pressure drop shall be maintained above the minimum value of 0.4 inches water column.

V.D.5.a.7. Whenever hazardous waste is in the unit, the hourly rolling average pH of the feed to the wet scrubber shall be maintained above the minimum value of 8.5.

V.D.5.a.8. The combined total chlorine feed rate from all feedstreams shall be no greater than 10,073 pounds per hour.

V.D.5.a.9. Whenever hazardous waste is in the unit, the Permittee shall maintain a minimum atomizing fluid pressure of 40 pounds per square inch, gage.

V.D.5.a.10. The Permittee shall immediately stop the flow of hazardous waste into the combustion unit should sample flow to the Continuous Emissions Monitoring System (CEMS) cease, outside of normal calibration periods.

V.D.5.a.11. At a minimum, the Permittee shall analyze values from the Continuous Emissions Monitoring System (CEMS) every 15 seconds. The Permittee must record these values every 60 seconds to demonstrate compliance with the monitoring requirements.

TABLE 5

NO. 3 HALOGEN ACID FURNACE
GROUP A PARAMETER LIMITS
(AUTOMATIC WASTE FEED CUT OFF)

Control Parameter	Final Operating Limits Automatic Waste Feed Cut Off Point
Minimum combustion zone temperature	2159°F, hourly rolling average
Maximum inlet air flow rate	910,200 scfh, hourly rolling average
Maximum hazardous waste feed rate	8972 lb/hr, hourly rolling average
Maximum stack gas carbon monoxide	100 ppmv, corrected to 7% oxygen on a dry gas basis, hourly rolling average
Minimum secondary scrubber liquid to gas ratio	16 gal/Mscf, hourly rolling average
Minimum secondary scrubber pressure drop	0.4 inches water column, hourly rolling average
Minimum secondary scrubber liquid pH	8.5, hourly rolling average
Maximum total chlorine feed rate	10,073 lb/hr, hourly rolling average
Minimum atomizing fluid pressure	40 psig, hourly rolling average

V.E. RISK-BASED CONDITIONS

(RESERVED)

VI. GROUNDWATER PROTECTION

VI.A. APPLICABILITY

The regulations of Louisiana Administrative Code (LAC), Title 33, Part V, Chapter 3, 5, 15, 19, 21, 33, 35, and 37, and the Louisiana Hazardous Waste Control Law Revised Statute (R.S.) 30:2171 et seq., of the Environmental Quality Control Act, R.S. 30:2001 et seq., and the provisions of this Condition shall apply to ground water protection programs for Units that are used to treat, store, and dispose hazardous wastes at PPG Industries., in Westlake, LA. No permitted units are identified in this permit which are subject to groundwater monitoring at this time.

VI.B. REQUIRED PROGRAMS

If ground water contamination is confirmed as a result of operations related to past or present hazardous waste management units, the Permittee shall establish, expand, or continue assessment and corrective action programs in accordance with the requirements of LAC 33:V.Chapter 3321 and as subsequently directed by the Administrative Authority.

HAZARDOUS AND SOLID WASTE AMENDMENTS

VII.GENERAL CONDITIONS PURSUANT TO THE HAZARDOUS AND SOLID WASTE AMENDMENTS

VII.A. STANDARD CONDITIONS

VII.A.1. Waste Minimization

Annually, by March 1, for the previous year ending December 31, the Permittee shall enter into the operating record as required by LAC 33:V.1529.B.19, a statement certified according to LAC 33:V.513.A specifying that the Permittee has a program in place to reduce the volume and toxicity of hazardous wastes generated by the facility's operation to the degree determined by the Permittee to be economically practicable; and the proposed method of treatment, storage, or practicable disposal method that is currently available to the Permittee which minimizes the present and future threat to human health and the environment. A current description of the program shall be maintained in the operating record and a copy of the annual certified statement shall be submitted to the Administrative Authority. The following criteria should be considered for the program:

VII.A.1.a. Any written policy or statement that outlines goals, objectives, and/or methods for source reduction and recycling of hazardous waste at the facility;

VII.A.1.b. Any employee training or incentive programs designed to identify and implement source reduction and recycling opportunities;

VII.A.1.c. An itemized list of the dollar amounts of capital expenditures (plant and equipment) and operating costs devoted to source reduction and recycling of hazardous waste;

VII.A.1.d. Factors that have prevented implementation of source reduction and/or recycling;

VII.A.1.e. Sources of information on source reduction and/or recycling received at the facility (e.g., local government, trade associations, suppliers, etc.);

VII.A.1.f. An investigation of additional waste minimization efforts that could be implemented at the facility. This investigation would analyze the potential for reducing the quantity and toxicity of each waste stream through production reformulation, recycling, and all other appropriate means. The analysis would include an assessment of the technical feasibility, cost, and potential waste reduction for each option;

VII.A.1.g. A flow chart or matrix detailing all hazardous wastes the facility produces by quantity, type, and building/area;

VII.A.1.h. A demonstration of the need to use those processes that produce a particular hazardous waste due to a lack of alternative processes or available technology that would produce less hazardous waste;

VII.A.1.i. A description of the waste minimization methodology employed for each related process at the facility. The description should show whether source reduction or recycling is being employed;

VII.A.1.j. A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years; and

VII.A.1.k. The Permittee may meet the requirements for waste minimization by developing an Environmental Management System according to the EPA document, Integrated Environmental Management System Implementation Guide, EPA 744-R-00-011, October 2000, found on www.epa.gov/opptintr/dfe/pubs/iems/iems_guide/index.htm.

VII.A.2. Dust Suppression

Pursuant to LAC 33:V.4139.B.4, and the Toxic Substances Control Act, the Permittee shall not use waste or used oil or any other material which is contaminated with dioxin, polychlorinated biphenyls (PCBs), or any other hazardous waste (other than a waste identified solely on the basis of ignitability), for dust suppression or road treatment.

VII.A.3. Failure to Disclose

The Permittee's failure in the application or during the permit issuance process to disclose fully all relevant facts at any time may be cause for termination or modification of this Permit in accordance with LAC 33:323.B.2 and 3.

VII.A.4. Suspension, Modification, or Revocation and Reissuance, and Termination of Permit

This Permit may be modified, revoked and reissued, or terminated for cause as specified in LAC 33:V.323. The filing of a request by the Permittee for a permit modification, revocation and reissuance, termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay the applicability or enforceability of any permit condition.

VII.A.4.a. If the Administrative Authority tentatively decides to modify or revoke and reissue a permit under LAC 33:V.321.C. or 323, a draft permit shall be prepared incorporating the proposed changes. The Administrative Authority may request additional information and, in the case of a modified permit, may require the submission of an updated permit application.

VII.A.4.b. The Permittee may initiate permit modification proceedings under LAC 33:V.321.C. All applicable requirements and procedures as specified in LAC 33:V.321.C shall be followed.

VII.A.4.c. Modifications of this Permit do not constitute a reissuance of the Permit.

VII.A.5. Permit Review

This Permit may be reviewed by the Administrative Authority five years after the date of permit issuance and may be modified as necessary as provided for in LAC 33:V.323.B.2. Nothing in this section shall preclude the Administrative Authority from reviewing and modifying the Permit at any time during its term.

VII.A.6. Compliance with Permit

Compliance with a RCRA permit during its term constitutes compliance, for purposes of enforcement, with subtitle C of RCRA except for those requirements not included in the permit which:

VII.A.6.a. Become effective by statute;

VII.A.6.b. Are promulgated under LAC 33:V.Chapter 22 restricting the placement of hazardous wastes in or on the land; or

VII.A.6.c. Are promulgated under LAC 33:V.Chapters 23, 25 and 29 regarding leak detection systems for new and replacement surface impoundment, waste pile, and landfill units, and lateral expansions of surface impoundment, waste pile, and landfill units. The leak detection system requirements include double liners, construction quality assurance (CQA) programs, monitoring action leakage rates, and response action plans, and will be implemented through the procedures of LAC 33:V.321.C Class 1 permit modifications.

VII.A.7. Specific Waste Ban

VII.A.7.a. The Permittee shall not place in any land disposal unit the wastes specified in LAC 33:V. Chapter 22 after the effective date of the prohibition unless the Administrative Authority has established disposal or treatment standards for the hazardous waste and the Permittee meets such standards and other applicable conditions of this Permit.

VII.A.7.b. The Permittee may store wastes restricted under LAC 33:V.Chapter 22 solely for the purpose of accumulating quantities necessary to

facilitate proper recovery, treatment, or disposal provided that it meets the requirements of LAC 33:V.2205 including, but not limited to, clearly marking each tank or container.

VII.A.7.c. The Permittee is required to comply with all applicable requirements of LAC 33:V.2245 as amended. Changes to the Waste Analysis Plan will be considered permit modifications at the request of the Permittee, pursuant to LAC 33:V.321.C.

VII.A.7.d. The Permittee shall review the waste analysis plan and analyze the waste when a process changes to determine whether the waste meets applicable treatment standards. Results shall be maintained in the operating record pursuant to LAC 33:V.1529.B.6 and in accordance with Conditions III.C.3 and 4.

VII.A.8. Information Submittal for the Corrective Action Strategy

(RESERVED)

VII.A.9. Data Retention

(RESERVED)

VII.A.10. Management of Wastes

(RESERVED)

VII.B. EMISSION STANDARDS - PROCESS VENTS, EQUIPMENT LEAKS, TANKS, SURFACE IMPOUNDMENTS, AND CONTAINERS (AA-BB-CC AIR REGULATIONS)

VII.B.1. PERFORMANCE STANDARDS FOR EQUIPMENT LEAKS

(RESERVED)

VII.B.2. STANDARDS FOR TANKS AND CONTAINERS

The Permittee complies with LAC 33:V.1759, for the emission control for containers and shall comply with all applicable regulations. All tanks used for hazardous waste storage are regulated by the provisions listed in the Hazardous Organics NESHAP (HON) and are not subject to regulation under LAC 33:V.Chapter 17.

VII.B.2.a. Operating Requirements

VII.B.2.a(1) The Permittee shall install and maintain all regulated units and associated emission control technology in accordance with the

detailed plans, schedules, information, and reports as contained in the Part B Permit Application.

VII.B.2.a(2) The Permittee shall, upon request, identify all less than 90-day accumulation tanks or containers, which contain or contact hazardous wastes with organic concentrations equal to or greater than 10 percent by weight and identify the emission control system requirements under LAC 33:V.1703 to 1715.

VII.B.2.b. Monitoring Requirements

VII.B.2.b(1) The pollution control methods used for containers shall be inspected on a periodic basis.

VII.B.2.b(2) Level 1 controls shall be inspected in accordance with LAC 33:V.1759.C.4.

VII.B.2.c. Recordkeeping Requirements

Air emission control design documentation shall be maintained in the facility operating record until the equipment is no longer in service. Records must be prepared and maintained for the various equipment and systems used at the facility.

VII.B.2.c(1) Facilities that are governed by this Chapter and use alternate control systems meeting the emission control standards of 40 CFR 60, Subpart VV or 40 CFR 61, Subpart V must meet LAC 33:V.1765.H requirements.

VII.B.2.c(2) All tanks or containers not using air emission controls in accordance with LAC 33:V.1747.D must meet LAC 33:V.1765.I requirements.

VII.B.2.d. Reporting Requirements

VII.B.2.d(1) For each tank, surface impoundment, or container which manages hazardous waste that is exempted from using air emission controls, a written report shall be submitted to the Administrative Authority within fifteen (15) days of each occurrence when hazardous waste is placed in the waste management unit in noncompliance with the conditions of LAC 33:V.1751.C, as applicable. The written report shall contain the EPA identification number, facility name and address, a description of the noncompliance event and the cause, the dates of the noncompliance, and the actions taken to correct the noncompliance and prevent reoccurrence of the noncompliance.

VII.B.2.d(2) For control devices used in accordance with the requirements of LAC 33:V.1735, a semiannual written report shall be submitted to the Administrative Authority, based on the date of submittal of the annual report, except as provided for in noncompliance situations. The report shall describe each occurrence during the previous six (6)-month period when a control device is operated continuously for twenty-four (24) hours or longer in noncompliance with the applicable operating values defined in LAC 33:V.1713.C.4 or when a flare is operated with visible emissions as defined in LAC 33:V.1707.D. The written report shall include the EPA identification number, facility name and address, an explanation why the control device could not be returned to compliance within 24 hours, and actions taken to correct the noncompliance.

VII.B.2.d(3) The report to the Administrative Authority in accordance with the requirements of VII.B.2.d.1. above is not required for a six (6)-month period during which all control devices subject to LAC 33:V, Subchapter C are operated such that during no period of twenty-four (24) hour or longer did control devices operate continuously in noncompliance with the applicable operating values defined in LAC 33:V.1713.C.4 or a flare operate with visible emissions as defined in LAC 33:V.1707.D.

VII.B.2.d(4) All reports shall be signed and dated by an authorized representative of the Permittee as per LAC 33:V.507.

TABLE VII.B.1

EMISSION CONTROLS FOR CONTAINERS/CONTAINER STORAGE AREAS

Container Storage Area Identification	LAC Reference(s)	Air Emission Controls	Visual Inspection
RCRA 1	LAC 33:V.1759.C-D	Level 1	Initially and Annually
RCRA 2	LAC 33:V.1759.C-D	Level 1	Initially and Annually
Mercury Recovery Unit	LAC 33:V.1759.C-D	Level 1	Initially and Annually
Mercury Drum Storage Area	LAC 33:V.1759.C-D	Level 1	Initially and Annually

VII.C. SPECIFIC CONDITION - CLOSURE

Pursuant to Section 3005(j)(1) of the Hazardous and Solid Waste Amendments of 1984, the Permittee shall close any closing units in accordance with the following provisions:

VII.C.1. Other than consolidation of any wastes from the sites in conformance with LAC 33:V.Chapter 22, Land Disposal Restrictions, the Permittee shall not place waste prohibited by LAC 33:V.Chapter 22 into any closing units;

VII.C.2. The Permittee shall perform unit closures in accordance with the Closure Plan(s) as approved at the time of closure, and which meet(s) all relevant State and Federal closure requirements at the time of closure; and

VII.C.3. The Permittee shall notify the Administrative Authority in writing at least 60 days prior to commencement of closure.

VIII. SPECIAL CONDITIONS PURSUANT TO HAZARDOUS AND SOLID WASTE AMENDMENTS

Section 3004(u) of RCRA, as amended by the Hazardous and Solid Waste Amendments (HSWA), and LAC 33:V.3322 require that permits issued after November 8, 1984, address corrective action for releases of hazardous waste or hazardous constituents from any solid waste management unit (SWMU) at the facility, regardless of when the waste was placed in the unit.

Each hazardous waste treatment, storage and disposal facility must address corrective action on a site-wide basis in the facility's RCRA permit. The permit must address provisions for investigation, and assessment and selection of final remedies for all releases and potential SWMUs at facilities subject to the provisions of LAC 33:V.3322. However, since a single facility or site may possess multiple RCRA permits, the specific HSWA corrective action provisions will not be contained in this document. Rather corrective action requirements will be addressed in the facility's post-closure permit.

ATTACHMENT 1

ATTACHMENT 1
LIST OF FACILITY DOCUMENTS INCORPORATED IN THE PERMIT BY REFERENCE
LAD008086506
AI#1255

DOCUMENT TYPE	APPLICATION /DOCUMENT DATE	ELECTRONIC DATABASE MANAGEMENT SYSTEM (EDMS) DOCUMENT ID	COMMENTS
Arrangement with local authorities	2/09/2005	32644718	Permit Application Volume 2, Attachment 10, page 187 of the EDMS Document
Closure cost estimates	6/10/2008	36997557	Update of Response to Notice of Deficiencies (2), Entire EDMS Document
Closure Plan	6/10/2008	36997557	Update of Response to Notice of Deficiencies (2), Entire EDMS Document
Contingency Plan	2/09/2005	32644718	Permit Application Volume 2, Attachment 10, page 187 of the EDMS Document
Inspection Plan	12/06/2008	36456164	Response to Notice of Deficiencies, Exhibit 16; page 369 of the EDMS document.
Security Plan	2/09/2005	32643318	Permit Application Volume 1, Chapter 15, page 160 of the EDMS Document
Personnel Training	2/09/2005	32643318,32644718	Permit Application Volume 1, Chapter 15, page 172 of the EDMS Document, and Permit Application Volume 2, page 181 of the EDMS Document
Waste Analysis Plan	2/22/2008	36619442	Response to Notice of Deficiencies (2), page 57 of the EDMS Document
Operating Records	2/09/2008	32643318	Permit Application Volume 1, Chapter 15, page 182 of the EDMS Document